



## WATER SAFETY POLICY

### 1. Introduction

This policy sets out how Citizen will meet its obligations under the requirements relevant regulation and legislation in respect of water safety and the prevention of legionella.

This policy outlines Citizen's approach to the management of water safety. This service is one of our most important functions as a landlord and we want to provide a service that we can take pride in, that achieves high satisfaction from our customers and enables customers to be safe in their homes.

This policy supports our vision of "home is our foundation for life" by defining our commitment to providing an efficient and effective legionella management service ensuring we are adhering to our pledge to be "looking out for our citizens".

This policy and its supporting procedures and guidance ensures that we meet the requirements of the following regulation and legislation and should be read in conjunction with the following documents: -

- Citizen Health & Safety Policy
- Health and Safety at Work etc. Act 1974
- The Management of Health and Safety at Work Regulations 1999
- Health & Safety Executive (Approved Code of Practice (ACOP L8 Rev 4 – 2013)
- HSG 274 Part 2 – 2014
- HSG 274 Part 3 – 2014
- HSG 220
- Control of Substances Hazardous to Health Regulations 2002 (as amended)
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Provision and Use of Work Equipment Regulations 1998 (PUWER)
- Housing Health & Safety Rating System (HHSRS Item 18)
- Water Supply (Water Fittings) Regulations 1999
- Water Regulations Advisory Scheme (WRAS)
- Water Fittings and Material Directory
- Water Supply (Water Quality) Regulations 2000
- BS 6700
- BS 8580-1:2019

### 2. Scope

This policy extends to all properties defined by the regulations and includes void and occupied property owned by us; properties we manage on behalf of others; leasehold and

#### WATER SAFETY POLICY

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Page 1 of 5

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shared ownership properties to which we have a contractual or statutory duty. This includes communal areas of our properties and garage sites.

We will provide the service to all water systems as defined in the regulations.

### 3. Policy detail

#### 3.1 Water Safety & Management Responsibilities Structure

<p><b>Overall responsibility for Water Safety Control:</b></p> <p><b>Planning:</b> Structure of organisation</p> <p><b>Organisation:</b> Setting objectives, policy and procedures</p> <p><b>Control:</b> Identify persons responsible to tasks / actions</p> <p><b>Monitoring:</b> Checks the implementation of standards</p> <p><b>Review:</b> Reviews of Legionella control performance standards</p>	<p><b>Responsible Person</b> <b>Chief Executive Officer</b></p>
<p>Responsibility for developing and reviewing the</p> <ul style="list-style-type: none"> <li>- <b>Water Safety Management Plan</b></li> <li>- <b>Water Safety Action Plans:</b></li> <li>- <b>Development of Written Schemes of Control:</b></li> <li>- <b>Legionella Risk Assessments:</b></li> </ul> <p>Which sets out the details and procedures to be taken by all staff, visitors, and members of the public, service users and all relevant persons that may be affected by Legionella.</p>	<p><b>Responsible Person:</b> Head of Health, Safety &amp; Compliance</p>
<p>Responsibility for <b>Deputising</b></p> <p>In the absence of the Head of Health, Safety &amp; Compliance for legionella Control and Management.</p>	<p><b>Deputy/Competent Person:</b> Senior M&amp;E Surveyor</p>

#### 3.2 Risk Assessments

Risk assessments are carried out every two years or when there is a significant change to the water management systems. Risk assessments will reflect current changes in legislative requirements to ensure they remain compliant.

Action plans will be completed in order of the highest priority first utilising a R.A.G. arrangement based on the risk priority identified.

#### WATER SAFETY POLICY

Actions will be completed within agreed timescales and the actions taken recorded and dated as required, following regular reviews.

### **3.3 Written Scheme of Control**

The risk from exposure will normally be controlled by measures which do not allow the proliferation of legionella bacteria in the system. Once the risk is identified and assessed, a written scheme of control will be prepared, implemented, and properly managed for preventing or controlling legionella.

The scheme should specify the various control measures, how to use and carry out those measures, describe the water treatment regimes and the correct operation of the water system. The scheme should be specific and tailored to the system covered by the risk assessment. Control measures and further advice can be found in guidance (HSG 274 Part 2)

### **3.4 Water Safety Management Plan**

To deliver the requirements of this policy Citizen has a Water Safety Management Plan in place. All maintenance, inspection and water standards will be delivered in line with that plan and are set out in guidance and Standard Operating Procedures.

The Water Safety Management Plan

- a plan for working where legionella is identified as well as the process for communicating this information with anyone who may come into contact with legionella
- a schedule for monitoring water systems to ensure Legionella is prevented and detected
- the required recording of inspection and certification

Where the risk assessment identifies that legionella has been detected immediate action will be taken to ensure the health and safety of customers, employees and any other person affected.

### **3.5 Management Review**

The Deputy Person will make sure that the Responsible Person is updated on any areas of concern as soon as they happen. Legionella is a standing item on the quarterly Technical Health and Safety Committee meetings and any concerns or issues are formerly raised and tracked through this meeting

### **3.6 Communication**

Citizen is committed to an open and honest approach with regards to the presence and management of legionella

#### **WATER SAFETY POLICY**

Customers will be provided with information regarding the risk of legionella in their homes. When any works are undertaken in their property or communal areas affecting customers, the customers are provided with the information relevant to the works being undertaken and kept updated throughout.

Staff will be trained and provided with Standard Operating Procedures relevant to their roles along with training and appropriate supervision.

Contractors will be provided with legionella information relevant to the works they are undertaking. Contractors will be competent for the type and level of works that they undertake, assessed through the relevant procurement process.

### **3.7 Investment Works**

Large scale refurbishment and investment programmes will ensure that all works being undertaken conform to the requirements of this Protocol and are in line with current building regulations and guidance. In particular system designs are arranged to prevent the causation and proliferation of bacteria in water systems and to reduce heat gain as far as reasonably practicable, through isolation or insulation.

## **4. Responsibility and Governance**

It is the responsibility of the Board to ensure that this policy is successfully implemented, and the procedures followed. The Senior Leadership Team and Heads of Service are responsible for ensuring that all staff understand the importance of this policy and the related procedures and comply with them.

Managers are responsible for ensuring that their reports have undertaken the appropriate policy eLearning by utilising reports produced by Learning and Development

Any changes to this policy must be made in line with the requirements set out in Citizens Standing Orders and our Policy framework.

## **5. Monitoring and review**

This policy will be reviewed every 3 years, unless legislation, service delivery or sector developments require otherwise ensuring the policy continues to meet its objectives and take account of good practice developments.

Legal advice will be taken to ensure compliance with legal, regulatory and contractual responsibilities.



Where appropriate service delivery reports in respect of this policy as incorporated into our quarterly reporting suite.

### 6. Equality impact assessment

This policy has been subject to an Equality Analysis. Staff working across Citizen have considered the impact of this policy on different groups and communities that we work with. In framing this policy, our staff are committed to not discriminate adversely against any group and will respect the diversity of the communities we are working within.

The EIA and any actions identified as needing to be implemented are in Appendix 1

### 7. Version control

EVERY change made must be logged in the version control and ALL boxes completed.

VERSION	DATE	AMENDMENTS	APPROVED AT/BY	REVIEW
V 1.0	Feb 2022	New policy created from existing protocol	Citizen Board	Feb 2025

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Page 5 of 5

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