



Water Management Policy

Overview:	This policy sets out our approach to water management
Version:	V1
Approved by:	Eldonians Board
Approved date:	28 September 2023
Issued date:	28 September 2023
Review date:	28 September 2025
Champion:	Chief Executive Officer
Document owner:	Chief Operations Officer

Contents

1. Introduction	page 3
2. Scope of Policy	page 3
3. Obligations	page 3
4. Statement of Intent	page 4
5. Follow up Work	page 5
6. Roles & Responsibilities	page 5
7. Competent Person	page 5
8. Training	page 6
9. Performance Reporting	page 6
10.Non-Compliance	page 6
11.Date Protection	page 6
12.Monitoring & Review	page 6
13.13.Equality Impact Statement	page 7

Eldonian Community Based Housing Association Ltd Water Management Policy

1. INTRODUCTION

Eldonian Community Based Housing Association Ltd (ECBHA) is a community based not-for-profit organisation.

This policy sets out specific guidance to ensure compliance with water hygiene legislation and control the risk by introducing measures which reduce and/or control the risk of legionella growth and to identify, manage and/or mitigate risks associated with hot and cold-water systems or any other system that may cause exposure to legionella bacteria.

2. SCOPE OF POLICY

Legionellosis is a collective term for diseases caused by legionella bacteria including the most serious Legionnaires' disease, as well as the similar but less serious conditions of Pontiac fever and Lochgoilhead fever. Legionnaires' disease is a potentially fatal form of pneumonia, and everyone is susceptible to infection. The risk increases with age, but some people are at higher risk including people over 45 years of age, smokers and heavy drinkers, people suffering from chronic respiratory or kidney disease, diabetes, lung and heart disease, anyone with an impaired immune system.

There is reasonably foreseeable risk of exposure to Legionella bacteria exists in the following situations: water systems incorporating a cooling tower or evaporative condenser; hot and cold-water systems; other plant and systems containing water which are likely to exceed 20C and which may release a cloud of droplets and/or droplet nuclei (residue that remains when water has evaporated) during operation or when being maintained.

ECBHA must establish a policy to meet the requirements of the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999 (the Management Regulations) and the Control of Substances Hazardous to Health Regulations 2002. (COSHH) and will adhere to the Approved Code of Practice L8 advice.

ECBHA will report compliance with water hygiene legislation through the CHIEF Operations Officer to the Board.

This policy is relevant to all ECBHA employees, tenants, contractors and other persons or other stakeholders who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services.

3. OBLIGATIONS

The Control of Substances Hazardous to Health Regulations 2002 (as amended) (COSHH), the Management of Health and Safety at Work Regulations 1999 and the Health and Safety at Work Act 1974 place a duty, as an employer or person in control of a premises, to take suitable precautions to prevent or control the risk of exposure to legionella.

To carry out a risk assessment for all hot and cold-water systems, cooling plant and any other systems that can produce water droplets to establish any potential risks and implement measures to either eliminate or control identified risks.

ECBHA as the Duty Holder responsible for the control of legionella and water hygiene safety will appoint a competent person to carry out legionella risk assessments, production of a written scheme and implementation of that scheme to prevent or control the risks.

4. STATEMENT OF INTENT

ECBHA acknowledges and accepts its responsibilities with regard to water hygiene safety and preventing exposure to legionella.

ECBHA will hold accurate records against each property it owns or manages, identifying when water risk assessments and safety checks were last inspected, records will also identify properties where maintenance remedial works have been carried out to eliminate or reduce the risk of exposure to legionella. These will be stored on ECBHA's shared drive/ housing system.

At present the properties that are included in this policy include 2 blocks of apartments one which was originally a sheltered home scheme, there are still vulnerable residents in the apartment block.

ECBHA as the 'Duty Holder' responsible for control of legionella and water hygiene safety will ensure that only suitably competent consultants and contractors are registered members of the Legionella Control Association (LCA) or equivalent are to be procured and appointed to undertake risk assessments, prepare written schemes of control, and undertake works in respect of water hygiene and legionella control.

ECBHA will ensure that properties are risk assessed by a competent person for potential to cause exposure to legionella. The risk assessment should include:

- Name of the competent person carrying out the risk assessment
- A description of the system, any potential risk source, and any controls currently in place to control the risk
- Monitoring, inspection, and maintenance procedures
- Records of the monitoring results, inspection and checks carried out and review date.

Where the risks are assessed to be insignificant and are being properly managed to comply with the law, no further action is required. ECBHA will periodically review these risk assessments every 2 years in case anything changes.

ECBHA will ensure that a 'written scheme of control' is developed and fully implemented for all properties risk assessed as requiring controls, in order to adequately manage the risk of legionella exposure.

- The system, e.g., developing a written schematic.
- Who is responsible for carrying out the assessment and managing its implementation
- The safe and correct operation of the system
- What control methods and other precautions are required and what checks will be carried out to ensure risks are being managed and how often

ECBHA will ensure that robust processes and controls are in place to ensure that all remedial works identified through risk assessments and subsequent control activities are completed within reasonable timescale commensurate with the risk identified. All heating installations relating to sheltered and supported properties and communal facilities will be equipped with TMV's over the next 5 years.

ECBHA will have a robust process in place to gain access to properties where tenant vulnerability issues are known or identified whilst ensuring the organisation can gain timely access to any property in order to be compliant with this policy and safeguard the wellbeing of the tenant.

ECBHA will establish and maintain a plan of all continuous improvement activity undertaken with regards to water hygiene safety.

5. Follow Up Work

ECBHA will ensure there is a robust process in place for the management of any follow-up works required following the completion of a water hygiene and or legionella risk assessment or where identified by the competent person when undertaking required maintenance activities.

ECBHA will ensure that there is a robust process in place to collate and record details of all remedial works and water testing completed against individual installations.

6. ROLES AND RESPONSIBILITIES

The Board has overall governance responsibility for health and safety and compliance and ensuring the organisation complies with all relevant legislation and regulation.

The Chief Operations Officer will oversee the implementation of the Water Safety Policy, with operational support from the relevant staff.

7. COMPETENT PERSONS

ECBHA will ensure that officers responsible for operational delivery receive appropriate training to be able to manage the service.

ECBHA will ensure only those legionella/water treatment contractors licensed by Legionella Control Association and/or equally approved will be permitted to carry out water risk assessments.

All associated water safety related works will be undertaken by suitably trained and competent contractors.

8. TRAINING

Appropriate basic awareness training will be provided to officers. This will include team and contractor briefings, e-learning and access to external training.

9. PERFORMANCE REPORTING

Robust key performance indicator (KPI) measures are in place and will be maintained to ensure ECBHA is able to report on performance in relation to water hygiene/legionella safety.

KPI measures will be provided at Senior Management Team and Board level and be produced on a quarterly basis.

ECBHA will carry out an independent audit of water hygiene and legionella safety every two years. This audit will specifically test for compliance with the regulation, legislation and codes of practice and identify and non-compliance issues for correction.

10. NON-COMPLIANCE

Any non-compliance issue identified at an operational level will be formally reported to the Chief Operations Officer in the first instance. If non-compliance is due to refused access, then a risk assessment form is to be populated for evidence.

The Chief Operations Officer will agree an appropriate course of corrective action with the operational team in order to address the non-compliance issue and report details of the same to the SMT.

SMT will ensure the Board are made aware of any non-compliance issue so they can consider the implications and take action as appropriate.

11. DATA PROTECTION

When handling data sheets staff will come into contact with personal information. The handling and use of the data will be carried out under the General Data Protection Regulations 2018.

12. MONITORING AND REVIEW

We will monitor and report on compliance performance and use this information to identify areas for improvement.

This policy will be reviewed every 3 years, or sooner if required by statutory, regulatory, or

best practice.

13. EQUALITY IMPACT ASSESSMENT

In implementing this policy, we aim to treat all customers fairly. An equality impact assessment has been carried out. Where customers require additional support, we will endeavour to provide a service that seeks to meet the needs of a particular individual or household.