WATER SAFETY POLICY

(INCORPORATING LEGIONELLA CONTROL)

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WATER SAFETY POLICY

DOCUMENTATION MASTER SHEET

Amendments to this Document are Detailed Below.

Version Number	Date Amended	Comments	Date Approved	Author	Approved By
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05	01/03/2012	Minor Updates	01/03/2012	IH	Head of Property Services
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07	27/02/2019	Review	27/02/2019	SC	Simon Taylor
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WATER SAFETY POLICY

INTRODUCTION

GCH manage and maintain over 4400 properties in the locality of Gloucester. As a landlord and an employer, we have a moral and a legal duty to manage all water systems within our housing stock and places of work in a safe manner.

There are numerous types of systems installed in our homes which carry a varying degree of risk. These include hot and cold-water storage tanks, some of which feed individual properties and other communal systems feed multiple properties. Within the housing stock there are also a number of district heating systems utilising large water storage tanks and boosted cold mains.

Areas with the highest risks are systems which store water at a temperature between 20ºC and 45ºC with optimum breeding for the bacteria of around 37ºC. The presence of sediment, sludge, scale and organic material can act as a source of nutrients and a haven for Legionella bacteria. Therefore, a reasonably foreseeable risk of exposure to Legionella bacteria exists in: - Hot and cold-water systems, other plant and systems containing water (which is likely to exceed 20ºC) that may release a spray or aerosol during operation, or when being maintained.

The aim of this policy is to outline the ways in which GCH will manage the risk associated with our various systems and to ensure that we are compliant with all current legislation and best practise recommendations.

SCOPE OF POLICY

This Policy applies all properties owned or managed by GCH. It applies to all GCH staff and its Partners/Consultants/Contractors involved with maintenance or the provision of water systems, supervising such work, or issuing contracts for work. All must fully familiarise themselves with the contents of this document and implement the actions detailed within.

Within this policy a water system is understood to include all plant/equipment and components associated with that system, (e.g., all associated pipe work, pumps, feed tanks, valves, showers, heat exchangers, quench tanks, chillers, humidifiers, air washers, spa baths and pools, vehicle washes, wet scrubbers, indoor fountains, and water features).

LEGAL AND REGULATORY INFORMATION

GCH is committed to protecting the health, safety and welfare of its customers and employees. GCH recognise that ‘The Health and Safety at Work etc Act 1974’ extends to the risk from Legionella bacteria that may arise from work activities.

As well as the Act, there are three sets of Regulations and an Approved Code of Practice (ACoP) that apply to the control of Legionella bacteria in water systems. These are:

- The Control of Substances Hazardous to Health Regulations 2002 (COSHH)
- The Management of Health and Safety at Work Regulations 1999 (MHSWR)
- Legionnaires' disease. The control of Legionella bacteria in water systems. Approved Code of Practice and guidance L8 (ACoP L8).

SERVICE STANDARDS

Gloucester City Homes recognises the need to protect its employees and others from the harmful effects of Legionella by:

- Complying with the above Regulations,
- Providing standards not less than those set out in the ACoP L8,
- Appointing a person or persons, to take managerial responsibility and to provide supervision,
- Taking all reasonable steps to prevent its employees and others from breathing in droplets of water containing harmful levels of Legionella,
- Keeping the appropriate records, and
- Providing appropriate training.

GCH policy is to remove, wherever possible, the risk at source and to install and maintain low risk water systems. Only when this is not feasible are control measures implemented.

GCH aims to minimise and control the risk from Legionnaires disease and will in identified high risk water systems:

- Appoint a Responsible Person and Deputy who will have a duty to put in place an action plan to minimise the risk of Legionella and to manage the necessary work systems and procedures.
- Identify and assess sources of risk, e.g., where conditions are present that may encourage Legionella bacteria to multiply or where there is a means of creating and disseminating breathable droplets and establish any items of non-compliance.
- Arrange a programme of routine inspection and testing of water systems, including, where needed, a programme of modification to any deficient systems and equipment, to work toward compliance.
- Implement, amend and monitor precautions for all relevant systems.
- Ensure the design of relevant building services for new, refurbished or modified systems is such that the HSC guidance is followed.
- Maintain operation and monitoring manuals of relevant water plant and equipment.
- Maintain record drawings of relevant water pipe work systems.
- Maintain records of maintenance, inspection and testing for a period of at least five years.

- Keep all relevant personnel adequately trained in practices and procedures with respect to the control of Legionella.

TESTING FREQUENCY

Communal Water Testing by Contractor	Every six months
Shower head cleans by Contractor	Every quarter
Temperature testing by Specialist Housing Manager	Monthly
Flushing schedule by Specialist Housing Manager	Weekly
Risk Assessment	A new Risk Assessment will be carried out when: • There is a change to the water system or its use, • There is a change to the use of the building where the system is installed, • There is new information available about risk or control measures, • Changes to key personnel, • The results of our weekly flushing or monthly monitoring indicate our measures are no longer effective, or • There is a case of legionnaires disease / legionellosis associated with the system.

THE DUTY HOLDER AND RESPONSIBLE PERSON

The Duty Holder for GCH is the Chief Executive, and in accordance with the ACoP L8 they should appoint a Responsible Person to take on the day-to-day responsibility for controlling any identified risk from Legionella bacteria.

The appointed Responsible Person for GCH is the Executive Director of Customer Experience or Director of Homes & Sustainability appointed from time to time who will have sufficient authority, competence and knowledge to ensure that all operational procedures are carried out in a timely and effective manner. The Responsible Person may appoint Deputies to act on their behalf.

The Responsible Person and any Deputies must have the ability, experience, instruction, information, training and resources to enable them to carry out risk assessments and

implement appropriate measures to ensure that any risks are adequately controlled. They will be responsible for taking the managerial responsibility and to provide supervision for the implementation of the precaution.

Any Contractors appointed to advise GCH or undertake works on behalf of GCH will be required to be members of the Legionella Control Association and provide a copy of their Certificate of Registration with the Responsible person. The Responsible Person would be required to audit the Certificate to ensure that the Contractor's registration is for the categories required by GCH.

The function of the Responsible Person and any Deputies, in association with suitable staff / external expert advisors, consultants, contractors and maintenance staff, as needed, will be to:

- Advise on the potential areas of risk and identify any systems that do not comply with the ACoP L8,
- Advise on the necessary (continuing) procedures for the prevention of Legionella,
- Monitor the implementation and efficiency of the procedures,
- Review all risk assessments,
- Approve and identify any changes to the procedures,
- Maintain adequate appropriate records, in accordance with the written schemes arising from the risk assessments,
- Manage any outbreak of Legionnaires' disease if suspected or confirmed from a property managed by Gloucester City Homes. To take all appropriate measures, in accordance with the requirements of the Health Protection Agency, e.g., a contaminated system must immediately be shut down, isolated, cleaned and chlorinated, or treated with a biocide, in accordance with the latest Health and Safety Executive (HSE) Guidance.

RISK ASSESSMENT

A suitable and sufficient assessment is required to identify and assess the risk of exposure to Legionella bacteria from work activities and the water systems on the premises and any necessary precautionary measures. The primary objective is to avoid conditions that permit Legionella bacteria to proliferate and to avoid creating a spray or aerosol.

The assessment will include:

- Identification and evaluation of potential sources of risk, and
- The particular means by which exposure to Legionella is to be prevented, or
- If prevention is not reasonably practicable, the particular means by which the risk from exposure to Legionella bacteria is to be controlled.
- Ensure that systems are compliant with BS 6700:2006 Design, installation, testing and maintenance of services supplying water for domestic use within buildings and their curtilages – Specification, and the Water Supply (Water Fittings) Regulations 1999.
- A number of factors are required to create a risk of acquiring Legionellosis, such as:
- The presence of Legionella bacteria

- Conditions suitable for the multiplication of the organisms e.g., suitable temperatures (20°C - 45°C) and a source of nutrients e.g., sludge, scale, rust, algae and other organic matter.
- A means of creating and disseminating breathable droplets e.g., aerosol generated by showers and spray taps.
- The presence (and numbers) of people, who may be exposed, especially in premises where occupants are particularly vulnerable, e.g., sheltered properties.

Risk assessments will be prioritised by:

- Category 1 – Sheltered Complexes.
- Category 2 – Flats with communal water tanks, Houses of Multiple Occupation and Corporate Buildings.

The risk assessments will be reviewed regularly (at least every two years) and, whenever there is reason to suspect that it is no longer valid. An indication of when to review the assessment and what needs to be reviewed should be recorded.

This may result from:

- Changes to the water system or its use.
- Changes to the use of the building in which the water system is installed.
- The availability of new information about risks or control measures.
- The results of checks indicating that control measures are no longer effective.
- A case of Legionnaires' disease/Legionellosis is associated with the system.

IMPLEMENTING CONTROL MEASURES

Where the risk assessment shows that there is a risk that cannot be totally eliminated, then GCH will introduce proper controls, emanating from the Risk Assessments and the Written Schemes, which could include disinfection of the system (reference will be made to the ACoP for guidance on the specific action to be taken).

As the design, maintenance and operation of the system are crucial in controlling the growth of Legionella, any action taken will include the following:

- Ensuring water cannot stagnate anywhere in the system, e.g., remove redundant pipe work, run taps/showers in unoccupied rooms.
- Reduce storage of water in line with BS6700: 2006.
- All GCH Specialist Housing Mangers will be responsible to run showers continuously for a minimum of 5 minutes on each new letting of a property on their scheme and also communal showers on a weekly basis.
- Keeping water cisterns secure, covered, insulated, clean and free of debris,
- Insulating pipe work, maintaining the correct temperature (55oC) at the calorifier, i.e., the hot water cylinder

- Advising maintenance staff working on the system about the risks and how to minimise them, and
- Advising Residents about the risks, the control measures being taken and the precautions they can take, such as flushing through showers following a period of non-use, also including prolonged absences.

Note: *raising the temperature of the warm water is one way to control Legionella growth but could also increase the risk of burns and scalding. This will need to be considered when deciding which control measures to be used*.

Specific measures to be taken to ensure that control measures remain effective should include:

- An up-to-date plan showing layout of the plant or system, including any part temporarily out of use,
- A description of the correct and safe operation of the system,
- The precautions to be taken,
- Checks to be carried out to ensure effectiveness of the controls and the frequency of such checks, and
- Remedial action to be taken in the event that the control measures are shown not to be effective.

MONITORING AND INSPECTION

Where there is a risk there is a need to ensure that the control measures remain effective and this is the duty of the Responsible Person and any Deputies or where appropriate, an external contractor and involves:

- Checking the performance of the system and its component parts,
- Inspecting the accessible parts of the system for damage and signs of contamination; and
- Monitoring to ensure that the treatment regime continues to be effective to control to the required standard.
- The frequency and extent of the routine monitoring will depend on the operating characteristics of the system and will be specified in the Risk Assessment and Written Scheme in accordance with the ACoP L8.

TESTING AND INSPECTION OF SYSTEM

The Responsible Person or Deputies will manage a Water Hygiene Service Contract comprising of testing, cleaning, sterilisation and bacteriological sampling and details of all maintenance, inspection and testing will be retained.

The Responsible Person or Deputies will arrange for the external contractor to carry out monthly, quarterly, six monthly and annual checks as appropriate.

These checks will highlight any deteriorating conditions in the water systems and ensure compliance with the requirements of the Risk Assessments and Written Schemes and highlight any additional remedial measures.

Inspection frequencies shall be in accordance with the ACoP L8 and follow the recommendations as specified in its Appendix.

AUDIT AND REVIEW

The Responsible Person or Deputies will ensure that all risk assessments and remedial actions are carried out in accordance with the ACoP L8, and that Contractors are working in compliance with the Code.

Review meetings will be held with the contractor on at least a six monthly basis to discuss progress with risk assessments and remedial actions.

All testing schedules will be monitored through the GCH compliance matrix and reported on at a monthly compliance meeting.

RECORDS

Records of Risk Assessments and Water Hygiene Surveys of water systems carried out in accordance with the ACoP L8 will be documented and stored securely. The Responsible Person, together with the appropriate Specialist Housing Manger for sheltered schemes, will hold the resulting information.

These records will contain:

- The findings of the Risk Assessment
- Written Schemes and details of its implementation; and
- The results of monitoring, inspection, test or check carried out and the dates. This should include the details of the state of operation (i.e., in use or not in use).
- Those performing the various tasks must sign all records and these records will be retained for five years.

TRAINING

The Responsible Person, any Deputies and other key personnel will be identified and provided with specialist training and regular refresher training, which will be recorded on their personal training records.

REVIEW

This policy will normally be reviewed triennially to ensure that it remains fit for purpose, unless an earlier review is required due to regulatory, statutory, or other requirements.