

# Water Hygiene & Safety Policy

## Governance Information

Applicable Legislation	<ul style="list-style-type: none"> <li>● HSE’s Approved Code of Practice (ACOP) ‘L8: The control of Legionella bacteria in water systems’ 2013 (4th edition);</li> <li>● Management of Health &amp; Safety at Work Regulations 1999;</li> <li>● Workplace (Health, Safety &amp; Welfare) Regulations 1992;</li> <li>● Health &amp; Safety at Work Act 1974;</li> <li>● The Housing Act 2004;</li> <li>● The Building Regulations 2010;</li> <li>● The Control of Substances Hazardous to Health Regulations 2002;</li> <li>● Construction Design &amp; Management Regulations 2015. <ul style="list-style-type: none"> <li>● Reporting of Injuries, Diseases, and Dangerous Occurrences Regulations (RIDDOR) 2013</li> </ul> </li> </ul>
Policy Owner	Director of Operations
Approved By	CMT
Regulatory Reference	Safety & Quality Standard
Date Approved	March 2026
Review Date	March 2028
Stakeholders Consulted	THSP – Health and Safety Consultants

## Version Control

Version	Date	Author	Change
V1	May 2024	Consultant review	Complete overhaul of the Policy
V2	March 2026	Director of Operations	Periodic Review

## Contents

1. Policy Statement.
2. Purpose
3. Scope
4. Our Commitment
5. Testing & Inspection Programmes
6. Maintenance & Compliance Follow Up Work
7. Definitions
8. Roles & Responsibilities
9. Equality Impact Assessment
10. Policy Review & Monitoring

## 1. Policy Statement

- 1.1. At the Industrial Dwelling Society (herein known as IDS) our residents' safety is our top priority. We are committed to ensuring that all water systems in our buildings and homes are safe and well-maintained. This policy outlines how we manage water safety and our approach to maintaining the highest standards, in compliance with UK legislation and best practices to reduce the risk of legionella and other bacteria.

## 2. Purpose

- 2.1 We adhere to the following principles to ensure the ongoing safety of our residents, employees, visitors, contractors, and the general public:
  - **Commitment to Safety** - We are dedicated to providing safe water systems across all our buildings and homes. This involves regular maintenance, inspections and testing to prevent the growth of Legionella at all times.
  - **Robust Control Measures** – We will maintain water systems in accordance with HSE guidelines and manufacturer instructions, and implement temperature control measures to prevent the growth of Legionella bacteria. We will ensure systems are properly flushed and maintained, especially after periods of non-use which we determine to be equal to or greater than 7 days.

**Record-Keeping:** Comprehensive records of all water system inspections, testing, repairs, and maintenance activities will be maintained on IDS IT systems to ensure accountability and compliance with legal and regulatory requirements. Periodic audits will be conducted to ensure data integrity. Records will be kept for a minimum of two years.

## 3. Scope

- 3.1 This policy applies to all to IDS employees, tenants and representatives of IDS, including contractors and third parties who carry out duties on our behalf
- 3.2 This Policy covers water systems owned by IDS in both domestic and commercial premises. This includes cold water storage tanks, hot water tanks, water pumps, thermostatic mixing valves, sentinel points, and associated pipes and equipment. Our typical domestic system installations will include combination boilers where appropriate to minimise risk through design, maintenance, and resident advice, rather than intensive monitoring.
- 3.3 The Policy should be read in conjunction with the following IDS policies: Health & Safety Policy, Electrical safety policy, Asbestos Policy, Allocations & Lettings Policy, and Repairs & Maintenance Policy.

## 4. Our Commitment

- 4.1 IDS will ensure that all water systems are maintained in a safe and usable condition in line with our responsibilities as a landlord and relevant legislation. We will carry out work safely, efficiently and in accordance with recognised good practice.
- 4.2 We will appoint a Responsible Person to take responsibility for Legionella control on behalf of IDS.
- 4.3 We will promote the importance of water hygiene to IDS residents. This will include how residents can prevent Legionella by looking after and regularly cleaning water appliances and outlets that they are responsible for in their homes.
- 4.4 We will make available all written schemes of control for the communal areas of buildings to advise our residents how the risk of exposure to legionella bacteria is being managed and controlled.
- 4.5 We will ensure that only suitably competent contractors undertake work on our water systems on behalf of the organisation.

- 4.6 We will hold accurate records against each property we own or manage including risk assessments, written schemes of control, remedial works, water quality tests and audits.

## 5. Testing & Inspection Programmes

- 5.1 IDS will appoint a competent person to carry out risk assessments and written schemes of control for all of our properties. We will review risk assessments every 2 years (or as stated in the risk assessment), and where there is a material change to a building that may affect the water system a new risk assessment will be completed. Other factors include a change in use or occupancy, the failure of a control measure, prolonged shutdowns, or as a result of positive sampling.
- 5.2 We will appoint a competent person to carry out monthly testing and flushing of water systems in our high risk buildings – Sheltered Housing homes and our offices. This frequency will be amended if determined by future risk assessments.
- 5.3 We will ensure that a risk assessment for water hygiene safety is carried out on all empty properties prior to commencing works which may affect the hot and cold water systems, and that any identified risk control measures are fully implemented where identified. This will include flushing the water systems before the property is let.
- 5.4
- 5.5 We will have robust processes in place to gain access to a property should any resident refuse access for us to carry out an essential water safety testing and/or remediation works.
- 5.6 We will have processes in place to access properties with vulnerable residents, ensuring timely compliance and safeguarding their wellbeing whilst balancing the need to manage health and safety risks.

## 6. Maintenance & Compliance Follow Up Work

- 6.1 IDS will carry out a programme of maintenance visits by competent persons to all properties that have a written scheme of control in place. These programmes will ensure that all maintenance and testing set out in the written scheme of control is fully completed at the times and intervals stated.
- 6.2 We will ensure there is a robust process in place to investigate and manage all RIDDOR notices issued with regard to water hygiene and legionella safety.

## 7. Definitions

Responsible Person	An IDS employee who will take day-to-day responsibility for controlling any identified risks from legionella bacteria.
Competent Person	Someone appointed by IDS with sufficient authority, competence, necessary skills, and knowledge to manage the risk of legionella bacteria in water systems.
Legionella	A bacteria found in water that can cause Legionnaires disease.
Written Scheme of Control	A comprehensive risk management document that identifies the measures taken to control Legionella.

RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulation. This is the Law that requires employers to report and keep records of all work-related fatalities, injuries, diagnosed cases of reportable occupational diseases and dangerous occurrences.
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## 8. Roles & Responsibilities

Chief Executive	Responsible person for legionella control.
Director of Operations	Overall responsibility for the implementation of this policy.
Head of Asset Management and Compliance and M&E Compliance Manager	Responsible for overseeing water hygiene safety policy and service and maintenance programmes
Compliance Officer	General administration to support water hygiene safety contract

## 9. Equality Impact Assessment

An Equality Impact Assessment has been completed for this Policy.

## 10. Policy Review & Monitoring

- 10.1 We will review this policy every two years, or following legislative change, to ensure the Policy remains effective and complies with current legislation and good practice.
- 10.2 All relevant KPI's aligned to the management of water safety are regularly monitored and reviewed as follows:
- Monthly by the Asset and Compliance team.
  - Quarterly at the Health and Safety Forum.
  - At every Operations Committee meeting.
  - At every Board meeting.
- 10.3 We will routinely monitor our performance in implementing this policy.

## Equality Impact Assessment

Group	Impact	Notes
Protected characteristics – <a href="#">Equality Act (2010)</a>		
Disability	Y	<p>IDS residents are responsible for maintaining and cleaning their own water appliances and outlets. We are aware that some residents may not be able to do this. In these circumstances we will look to support residents to do this where possible, and this will be assessed on a case by case basis.</p> <p>We recognise that some IDS residents may lack the capacity to understand the importance of water safety. We will work closely with these residents to support them to keep themselves and their homes safe. We will safeguard the wellbeing of vulnerable residents.</p> <p>We will provide water safety information in formats that are accessible to everyone.</p>
Gender reassignment	N	
Marriage or civil partnership	N	
Pregnancy, maternity and parenthood	N	
Race	Y	We will ensure that water safety information is accessible to residents in their chosen language.
Religion or belief	N	
Sexual Orientation	N	
Sex / Gender	N	
Age	N	
Other factors for consideration		
Socio-economic background	N	
Caring responsibility	N	

Final Decision	<ul style="list-style-type: none"> <li>- Barriers or impact identified; policy adapted to eliminate or mitigate.</li> <li>-</li> </ul>
Date Completed	May 2024