


HOUSING DEVELOPMENT & CONTRACTS

Water Safety Policy

Date of Review:	September 2019
Reviewed By:	Ian Finlay, Project Manager
Approved By:	R John Griffiths Service Lead, Housing Development & Contracts
Signature:	
Date:	06.09.19
Date of Next Review:	1 st September 2020

1. Introduction

At the time of policy approval Slough Borough Council manages in the region of 6,000 tenanted properties. Water systems within blocks and to individual dwellings within the housing stock need to be risk assessed, kept safe for use, and if required, be regularly maintained.

This policy explains how Slough Borough Council's commitment to water safety will be met. It will be supported by a Water Safety Management Plan providing more detailed guidance and procedures.

2. Statement of Intent

The key objective of this policy is to describe how Slough Borough Council will meet the required statutory, contractual and regulatory requirements in relation to water safety. It will also cover how Slough Borough Council/Cabinet, as Duty Holder, will receive assurance.

The scope of this policy includes legionella management, scalding prevention, and un-adopted water systems.

Slough Borough Council will comply with all current and relevant legislation and specifically as detailed in the following:

- Legionella Bacteria in Water Systems technical guidance (HSG 274) and approve code of practice L8.
- Control of Substances Hazardous to Health Regulations 2002 (COSHH)

Slough Borough Council takes the view that delivery of the commitments within this policy will ensure that the requirements of other legislation, such as the Health and Safety at Work etc. Act 1974 and Landlord Tenant Act 1985, will also be met.

In addition, as a Landlord and provider of Social Housing Slough Borough Council must meet the requirements of the Regulator for Social Housing's (RSH) Homes Standard. (The economic standards do not apply to Local Authorities).

It is essential to ensure that customers, contractors, staff and visitors remain safe in Slough Borough Council's properties. Failure to properly discharge our legal or regulatory responsibilities may also result in:

- Prosecution by the Health and Safety Executive under Health and Safety at Work Act 1974
- Prosecution under Corporate Manslaughter and Corporate Homicide Act 2007
- RSH scrutiny

- Reputational damage
- Loss of confidence by stakeholders in the organisation

3. Policy

In order to comply with regulatory standards and legal obligations, and to ensure the safety of its customers, staff, contractors and visitors to its properties, Slough Borough Council will:

Process

- Provide clear lines of responsibility for the management of water safety supported by written guidance in the Water Safety Management Plan.
- Ensure that a clear and consistent process including front-line engagement and enforcement is in place to obtain access to properties to undertake water safety checks, which shall include legal action when required.
- Proactively assess available data for relevant information about the customer to help gain access (disability, vulnerability, local connections, etc.).

Delivery

- Regularly review existing properties and assess risk within new stock through a desk top review which will identify those properties at potential high risk of legionella.
- All properties with communal stored water systems, and where a potential risk has been identified at desk top review, will have a Legionella Risk Assessment (LRA) undertaken.
- All other properties identified through the desk top review of potentially high risk will be subject to an LRA to determine if further management is required.
- The review period for future risk assessments will be established through a risk-based approach within the initial risk assessment carried out by the competent person.
- A water safety management and monitoring programme will be established as required from the LRA findings.
- A sample of domestic properties without LRAs will be assessed within an ongoing annual programme of LRAs, to determine the level of risk and take action to ensure that staff, customers, contractors and visitors are not exposed to legionella bacteria.

- Void properties will be flushed and shower heads disinfected or replaced as part of the void management process or before the customer occupies the property if the property has been empty for longer than 7 days. An LRA will be carried out if appropriate.
- Implement measures to reduce the risk of scalding by installing Thermostatic Mixer Valves (TMVs) to high risk properties, as detailed within the Water Safety Management Plan.
- Remove lead pipework that may still exist within the housing stock as Slough Borough Council is made aware.
- Maintain un-adopted water systems to the required standards as defined within the Water Safety Management Plan.

Contractors Competency

Slough Borough Council has responsibility to ensure that contractors are competent and the following controls will operate to ensure competence can be demonstrated.

- Only those Legionella/ water treatment contractors registered with and licensed by the HSE, / Legionella Control Association will be permitted to carry out work in our properties.
- All associated water safety related works will be undertaken by trained and competent contractors who shall be engaged to undertake any water safety related work. This will include a competence assessment against the nature of the work to be completed for any proposed contractor.
- Carry out an assessment of all contractor competencies annually or at change of contract/contractor, as detailed within the Water Safety Management Plan

Internal Competency

- Maintain a skills/training matrix to ensure that all staff undertaking key roles within the scope of this policy have appropriate training.
- Will operate a detailed competence framework including regular appraisals as part of the Water Safety Management Plan.

Data

- Maintain an up to date Master Database of all properties where it has a responsibility to provide water safety checks and maintenance.
- For each relevant property record maintain up to date data confirming which aspects of the water systems and appliances within the scope of

this policy exist and do not exist and the organisation's associated responsibility.

- Where a requirement exists hold data and certification relating to the last two safety checks and the next due date.
- Where a requirement does not exist hold appropriate evidence.

Assurance

- Ensure that all persons involved with water safety are properly trained and accredited.
- Carry out works-based assurance activity including checks on certification and post-inspection of onsite works to the level stated within the Management Plan. A proportion of such checks will be carried out by an independent party.
- Set a timetable for the review of the Water Safety Policy and the associated Management Plan.

Communication

- Encourage customers, through the provision of publicity information, to allow access to carry water safety checks and inspections and remedial works.

4. Implementation

The policy will be effective from September 2019 following Corporate Management Team (CMT) approval.

Staff will be made aware of the policy at priority training and a copy will be available on the intranet. The policy will be uploaded to the Slough Borough Council web site.

This policy should also be read in conjunction with the Compliance Strategy and Water Safety Management Plan.

There will be training provided for all those staff involved with the delivering the Compliance functions.

5. Consultation

This policy is based on legislative and regulatory requirements and as such consultation with customers has not taken place. There has been consultation with internal teams within Slough Borough Council.

6. Equality Impact Assessment (EIA)

We believe all people should be treated with dignity and respect regardless of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including, nationality, ethnic or national origins), religion, belief or non-belief, sex, or sexuality or by association with someone with any of these characteristics or perception of having any of these characteristics.

The EIA was undertaken on 6th September 2019 and no adverse discrimination was found. (See the full EIA document for further details)

7. Monitoring Performance

The following Performance Indicators (PIs) will be reported:

- % of Priority Scheme Properties with a Legionella Risk Assessment.
- % of General needs properties where a desk top risk assessment has been undertaken.
- % of properties within a legionella maintenance regime where testing has been completed and valid certification is in place.

Commentary will be provided for any properties out of date to include the date they became overdue, days overdue, and their position within the access legal process to bring them back into a compliant position. Commentary will also be provided if any properties have outstanding overdue actions. To provide additional context commentary will also include information on the proportion of activities within the reporting period that were undertaken before and after their due date.

A detailed PI suite will be defined within the Water Safety Management Plan

The following assurance activity will be undertaken and reported in line with the Water Safety Management Plan:

- Internal audit
- Strategic review
- 3rd Party Assurance

8. Policy Review

The policy will be reviewed every 12 months or earlier if deemed necessary through the performance monitoring process.

9. Amendment Log

Date of revision:	Record of amendments:	Reason for revision:
September 2019	Rewritten	Compliance Review