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Classification	Policy (sitting as an appendix to H&S Policy)
Title	Water Safety Policy
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Revised by	Director of Assets Head of Assets Assets Team Leader (Procurement & Compliance) Health & Safety Advisor
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Related Documents	Health & Safety Policy Water Safety written scheme
Location of Electronic Copy	V:\Policies and Procedures Shared\Policies\Health & Safety

1. Policy Statement

Viewpoint places a high importance on ensuring a safe and healthy environment for all employees, customers, contractors, visitors and members of the public.

As an employer, a landlord and owner of care homes, Viewpoint acknowledges and accepts its responsibilities with regard to water hygiene. Viewpoint are committed to providing robust processes and procedures to meet this responsibility and minimise the risks associated with poor water hygiene, namely, exposure to legionella bacteria, and the associated legionnaires disease, a potentially fatal form of pneumonia caused by the legionella bacteria, as well as the similar but less serious conditions of Pontiac Fever and Lochgoilhead Fever.

Legionnaires' disease has the potential to affect anybody. However, those more susceptible include those in the age range of 45 and above. As the main demographic using Viewpoint services are aged 50 and over, the management of water systems is of vital importance.

Viewpoint will identify, manage and/or mitigate risks associated with hot and cold water systems and any other systems that may cause exposure to legionella bacteria.

Viewpoint will seek to foster a positive attitude amongst staff, tenants and residents towards water safety and its importance.

2. Purpose

The purpose of this policy, and legionella written scheme which supports it, is to clearly outline the arrangements for water safety at Viewpoint in line with all legal and regulatory obligations and best practice guidance. This policy is written to ensure all reasonable steps have been taken to comply with The Control of Substances Hazardous to Health Regulations 2002 (as amended), The Water Supply (Water Fittings) (Scotland) Byelaws 2014 and all other relevant legislation.

The policy will ensure that legionella statutory compliance and performance of assets is appropriately recorded, monitored, reported, reviewed and where appropriate, improved, within premises controlled by Viewpoint. Viewpoint will aim to minimise and control the risk from Legionnaires' disease and, to this end, the policy will ensure:

- A duty holder is appointed to lead the management of water hygiene and ensure compliance is achieved and maintained. This role will be supported by the appointment of a responsible person, who will have a duty to put in place an action plan to minimise the risk of Legionella and

to manage and monitor the necessary work systems and legionella written scheme.

- Viewpoint will meet specific legal duties which relate to water safety, in particular, legionella risk management.. These include identifying and assessing sources of risk, managing the risk, preparing a scheme for preventing or controlling the risk, implementing and managing the scheme and keeping records and checking what has been done is effective.
- Viewpoint will 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 and actions required to rectify
- Viewpoint will assess the level of risk through a structured Legionella Risk Assessment programme, and aim to eliminate or reduce the risk to an acceptable level.
- Viewpoint will arrange for routine inspection and maintenance of water systems, and where needed, a programme of disinfection.
- Disinfection will be carried out whenever a routine inspection or risk assessment shows it necessary to do so and in any of the following circumstances;
 - after any prolonged shutdown of a month or longer (a risk assessment may indicate the need for cleaning after a period of less than one month, especially in summer where temperatures have been high);
 - if the system or part of it has been substantially altered or entered for maintenance purposes in a manner that may lead to contamination;
 - following an outbreak or suspected outbreak of legionnaires' disease or any other water borne infection/disease.
- Although legionella prevention is generally assumed to relate to cooling towers and water storage systems, ventilation systems can have similar problems and should be considered as part of the risk assessment along with air conditioning systems.
- Viewpoint will retain records of maintenance, inspection and testing for a minimum of 5 years.
- If it is suspected or confirmed that a tenant, employee or visitor has contracted legionnaires ' disease, Viewpoint will report the incident to the HSE under the Reporting or Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).

- Robust processes are in place to ensure competent contractors and sub-contractors are engaged to carry out legionella preventative monitoring and water hygiene services. As a minimum requirement, contractors are required to be a registered member of the Legionella Control Association (LCA) or the Water Management Society (WMSoc). Contracted works may include legionella sampling, tank inspections, water sampling, (for all bacteria) and other associated services, as identified in the Legionella Risk Assessment programme.
- Tenants are informed and educated on good water management and of any legionella control measures put in place that should be maintained. Tenants are made aware of their duties including their responsibility to clean shower heads, flushing requirements and informing Viewpoint of any problems, debris or discolouration in the water.
- Appropriate training is in place to ensure Viewpoint employees are competent to carry out their duties. Viewpoint must also ensure, where a contractor is appointed to carry out controls on behalf of Viewpoint, that their staff are appropriately trained. training requirements are outlined in the water safety procedure.
- All water systems are suitable and sufficient and comply with relevant legislation and shall be constructed of material that complies with the Scottish Water Bylaws 2014, as amended. Water fittings and system requirements, are outlined within the water safety written scheme.
- In the case of analysis of water testing results no person other than a trained specialist will make a determination on the seriousness and remedial actions required following an elevated result.

Water Risk Assessments

Viewpoint carries out a suitable and sufficient risk assessment programme to identify and assess the risk of exposure to legionella bacteria from all water systems across our property portfolio. The risk assessment forms an integral component of water safety management and is a legal requirement to identify potential hazards in the system.

A Legionella Risk Assessment will be carried out even if there are no water tanks present to demonstrate that potential risks have been considered, e.g:

- deadlegs or other high risk hardware in the plumbing system
- high risk events such as the property becoming void
- any required cleaning and/or maintenance events (e.g. shower heads in an HMO)

Viewpoint will aim to keep a degree of separation between the risk assessment process and the resultant remedial action programme. This could be achieved

by using independent companies for each or by ensuring different branches of the same organisation are engaged.

All recommendations and remedial action will be recorded. The recommendations should also highlight the management control actions that may be carried out in-house and those which would require an external contractor, and the frequency and type of checks that are required. Every property shall have a list of the necessary control measures written, to ensure the measures specified in the premise risk assessment are being carried out. This schedule will be held by the responsible person and audited annually to ensure it has been followed.

All risk assessments will be checked and accepted by the Responsible Person.

The risk assessment will be reviewed at regular intervals (two years is accepted as good practice) or when it is believed that the original risk assessment is no longer valid (e.g. following a change in the building or water supply, or following an incident).

Void Property Actions

It is recognised that all void properties have the potential to exhibit increased risk of legionella due to the possibility of stagnant water remaining undisturbed within pipework for prolonged periods.

The water safety procedure outlines the processes in place to mitigate the increased potential risk associated with voids. Measures include disinfection, flushing of outlets and inspections.

Monitoring and Auditing

- A formal process of auditing and monitoring the water safety management system is established and maintained, with properly defined reporting, escalation and action procedures.
- The Asset team will manage the planned programme of inspections to ensure that works are completed, undertaken in accordance with current best practice, with results reviewed and corrective actions implemented where required.
- Formal reviews will take place immediately following a breakout event occurring or any changes to the premises.

3. Legislation/related policies

The following information is not an exhaustive list of legislation and guidance. Instead, it is a reference point, signposting to those pieces of legislation and guidance that are most relevant to this policy.

- British Standards 8580:2019 – Water Quality: Risk Assessment for Legionella
- BS6920 Suitability of non-metallic products for use in contact with water intended for human consumption with regard to their effect on the quality of the water
- HSG220 Health and Safety in Residential Care Homes (2001)
- HSG274 Legionnaires Disease – Technical Guidance (in 3 Parts) (2013) – specifically part 2.
- IACL27 (rev2) Legionnaires Disease – A guide to Employers
- INDG 458 Legionnaires Disease – A brief Guide for Duty Holders (2012)
- Health & Safety Executive’s Approved Code of Practice (ACOP) and Guidance (Fourth Edition, Published 2013): Legionnaires Disease: The Control of Legionella Bacteria in Water Systems, commonly known and referred to as L8
- Public Health etc. (Scotland) Act 2008
- The Building (Scotland) Regulations 2004
- The Control of Substances Hazardous to Health Regulations 2002, as amended
- The Housing (Scotland) Act 2006
- The Management of Health and Safety at Work Regulations 1999
- The Private Water Supply (Scotland) 2006
- The Water Supply (Water Fittings) (Scotland) Byelaws 2014
- The Water Supply (Water Quality) (Scotland) Regulations 2001

4. Scope

This policy is applicable to all premises owned or managed by Viewpoint.

This policy applies to:

- 4.1. Viewpoint employees, tenants, residents, contractors and other persons or stakeholders who may work on, visit or use its premises or who may be affected by its activities and services.
- 4.2. Viewpoint’s duty to complete water risk assessments upon all of Viewpoint’s premises.
 - 4.2.1. Where Viewpoint own properties which are managed by a third party, Viewpoint retains ultimate responsibility for water safety, unless specified otherwise in the lease or management agreement. The same standards as outlined in this policy will apply.

- 4.2.2. Where Viewpoint manages properties on behalf of external owners, responsibility is set out in terms of the management agreement.
- 4.2.3. Where Viewpoint is the landlord in a block of flats with other flat owners, Viewpoint and the other flat owners will be jointly responsible for common areas.
- 4.2.4. Where Viewpoint acts as a Property Factor, responsibility is set out in the written statement of services.
- 4.2.5. For shared ownership arrangements, responsibility is set out in the repairs responsibility document.

5. Roles and Responsibilities

A full outline of all roles and responsibilities for named individuals with accountability for any aspect of water safety is within the water safety written scheme.

Board

The role of Viewpoint's Board is to ensure that this policy, as well as any associated policies and procedures, are regularly reviewed, as required, or in accordance with the usual cycle of policy review.

The Board will, in fulfilling its function, ensure that it complies as necessary with this policy, and the associated policies, procedures and documentation which support it.

Executive and Leadership Teams

The role of the Executive and Leadership Teams is responsibility for ensuring that this policy, and the associated policies, procedures and documentation which support it, are implemented within Viewpoint. The Executive and Leadership Teams shall ensure that water safety management systems and processes are in place, and that they are operated properly from day-to-day. The Executive and Leadership Teams shall also ensure that relevant managers and team members familiarise themselves with this policy, and the associated policies, procedures and documentation which support it, as well as undertaking any associated training.

The Director of Assets is the named duty holder for water safety.

The Head of Assets is the named responsible person for water safety.

Staff

All staff are responsible for ensuring that they familiarise themselves with this policy, and the associated policies, procedures and documentation which support it, as well as undertaking any associated training.

All staff with specific water safety responsibilities should understand the significance and importance of their role and ensure all processes outlined within the water safety policy and procedure are robustly followed.

All staff should look out for water hazards, including the risk of scalds, as a part of their routine duties. Any concerns must be reported immediately to line managers or to the Head of Assets (HOA).

6. Monitoring & Evaluation

This policy and Viewpoint's methodology for managing legionella will be reviewed every three years unless a material change in the prevailing legislation necessitates an earlier review. Risk assessments will be reviewed on a two yearly basis.