



Water Safety Policy

AST-POL-12-04

June 2023

0.	DOCUMENT CONTROL		
0.1	SUMMARY		
	Water Safety Policy		
0.2	DOCUMENT INFORMATION		
Role	Name/Position	Date	
Author	Vicky Houghton. Head of Asset Compliance	Jan 2023	
Approved by	Margaret Goddard, Group Assets Director	Jan 2023	
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0.3	DOCUMENT STATUS HISTORY		
Version	Date	Change owner	Reason for Update
1	19/06/23	VH	Approval process concluded through internal stakeholder consultation, GEMT approval and LOC approval (08/06/23)
2	14/05/24	VH	1 st Annual Review – No changes to Policy – Review date set at 2 years now embedded or following any significant Changes
0.4	DOCUMENT REVIEW DATE		
Review Due	June 2026		
Responsible Officer	Vicky Houghton		
0.5	DISTRIBUTION		
Name / Department	Title		
Torus	All Staff		
0.6	ASSOCIATED DOCUMENTS		
Ref: AST-STR-04-01	Title: Over-arching Compliance Policy		
Ref: AST-POL-14-04	Title: Gas and Carbon Monoxide Safety Policy		
Ref: AST-POL-13-04	Title: Electrical Safety Policy		
Ref: AST-POL-17-04	Title: Fire Safety Policy		
Ref: AST-POL-15-04	Title: Asbestos Safety Policy		
Ref: AST-POL-16-04	Title: Lift Safety Policy		

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1. Introduction

- 1.1 At the time of Policy approval Torus manages in the region of 37,000 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.
- 1.2 This Policy explains how Torus's commitment to Water Safety will be met. It will be supported by a Water Safety Management Plan providing more detailed Guidance and Procedures.
- 1.3 Legionella bacteria can cause several diseases including the Legionnaires' disease. The bacterium is common in natural water sources such as rivers, lakes, and reservoirs, but usually in small numbers. They may also be found in purpose-built Water Systems such as Cooling Towers, Evaporative Condensers, Hot and Cold-Water Systems and Spa Pools. 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 as detailed in our Management Plan. If conditions are favorable the bacteria may grow, increasing the risks of Legionnaires' disease and it is therefore important to control the risks.

2. Statement of Intent

- 2.1 The key objective of this Policy is to describe how Torus will meet the required statutory, legislative, and regulatory requirements in relation to Water Safety. It will also cover how Torus's Board, as Duty Holder, will receive assurance of statutory, legislative, and regulatory compliance.
- 2.2 The scope of this Policy includes Legionella Management, Scalding Prevention, and un-adopted Water Systems.
- 2.3 Torus will comply with all current and relevant legislation and specifically as detailed in the following:
 - Legionella Bacteria in Water Systems Technical Guidance (HSG 274 series Parts 1, 2 and 3)
 - Approved Code of Practice L8 (Fourth Edition 2013).
 - Control of Substances Hazardous to Health Regulations 2002 (COSHH)
 - Approved Code of Practice L5 (Sixth Edition 2013).
- 2.4 Torus 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 Act (HASAWA) 1974 and Landlord Tenant Act 1985 will also be met.

2.5 In addition, as a landlord and provider of Social Housing Torus must meet the requirements of the Regulator of Social Housing's (RSH) Home Standard.

2.6 It is essential to ensure that customers, contractors, staff, and visitors remain safe in Torus's Properties. Failure to properly discharge our statutory, legislative, or regulatory responsibilities may also result in:

- Prosecution by the Health and Safety Executive under HASAWA 1974.
- Prosecution under Corporate Manslaughter and Corporate Homicide Act 2007.
- Regulatory intervention (via scrutiny and potential determination of a breach of the Home Standard and serious detriment having been caused/potentially caused) by the RSH.
- Reputational damage to the Authority and staff.
- Loss of confidence by stakeholders in the organisation.

3. Policy

3.1 In order to comply with statutory, legal, and regulatory standards and obligations, and to ensure the safety of our customers, staff, contractors, and visitors to our properties\ Torus will:

3.2 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.).

3.3 Delivery

- Regularly review existing Properties and assess risk within new stock through a desktop 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 desktop review, will have a Legionella Risk Assessment (LRA) undertaken.
- All other Properties identified through the desktop 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 (Legionella Risk Assessments) 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 Torus is made aware.
- Maintain un-adopted Water Systems to the required standards as defined within the Water Safety Management Plan.

3.4 Contractors Competency

- Only those Legionella/Water Treatment contractors registered with, and licensed by, the Health and Safety Executive (HSE)/Legionella Control Association will be permitted to carry out work in our properties associated with Legionella testing.
- All associated Water Safety-related Works will be undertaken by trained and competent contractors. This will include a Competence Assessment against the nature of the Works 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.

3.5 Internal Competency

- Maintain a Skills/Training Matrix to ensure that all staff undertaking key roles within the scope of this Policy have appropriate training.
- Operate a detailed Competence Framework – including regular appraisals – as part of the Water Safety Management Plan.

3.6 Data

- Maintain a Master Database of all Properties where Torus has a responsibility to provide Water Safety Checks and Maintenance.

- For each relevant property, record and 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.
- Hold Water Safety Maintenance Records electronically in the Master Database, by the relevant Operational Department with other Landlord Compliance records. There may be instances where a hard copy is kept on site, and these will be detailed again in the Management Plan.
- 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.

3.7 Assurance

- Ensure that all persons involved with Water Safety are professionally trained and accredited.
- Carry out Works-based Quality Assurance/Quality Control (QA/QC) activity – including checks on Certification and Post-Inspection of on-site Works – to the level stated within the Water Safety Management Plan.
- Set a timetable for the review of the Water Safety Policy and the associated Water Safety Management Plan.

3.8 Communication

- Encourage customers, through the provision of publicity information, to allow access to carry out Water Safety Checks, Inspections and Remedial Works.

4. Implementation

- 4.1 This Policy will be effective from June 2023 following Board/Council/Cabinet approval.
- 4.2 Staff will be made aware of the Policy at priority training and a copy will be available on the Intranet. The Policy will also be uploaded to the Torus website.
- 4.3 This Policy should also be read in conjunction with the Torus Compliance Strategy and Water Safety Management Plan.
- 4.4 Appropriate training will be provided for all those staff involved with the operational delivery and implementation of the Landlord Compliance requirements and obligations in respect to Water Safety detailed within this Policy.

5. Consultation

5.1 This Policy is based on statutory, legislative, and regulatory requirements and, as such, consultation with customers has not taken place. There has been consultation with Internal Teams within Torus.

6. Equality Impact Analysis (EIA)

6.1 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.

6.2 Due to the nature of the policy, what it is aiming to achieve and no impact the implementation of the policy will have on employees/customers. An equality analysis is not required to be completed.

7. Monitoring Performance

7.1 A detailed PI (Performance Indicators) suite will be defined within the Water Safety Management Plan.

7.4 The following Quality Assurance (QA) activity will be undertaken and reported in line with the Water Safety Management Plan:

- Internal Audit.
- Strategic Review.
- 3rd Party Assurance.

8. Policy Review

8.1 The Policy will be reviewed every 24 months or earlier if deemed necessary through the Performance Monitoring process.

9 Amendment Log/Version Control

9.1 Revision Detail/Record:

Date of Revision:	Record of Amendments:	Reason for Revision:	By Whom: Name and Title
14/05/24	1 st Annual review – no changes – revised review date to 2-yearly	Review	Vicky Houghton, Head of Asset Compliance