



WATER SAFETY POLICY

Lead Manager:	Compliance Manager
Responsible Senior Manager:	Assistant Director of Assets
Approved By:	STAR Board
Date Approved:	11 March 2024
Date for Review:	March 2027
Version Number:	1

Contents

1. Purpose
2. Introduction
3. Policy Statement
4. Related Documents
5. Scope of Policy
6. Roles and Responsibilities
7. Policy Equality & Diversity Statement
8. Communications

1. Purpose

- 1.1 The purpose of this policy is to outline Shropshire Towns & Rural Housing's (STAR) approach to managing Water Safety in properties under the organisation's supervision and control. This policy offers a framework within which water safety will be directed and outlines essential roles and responsibilities for the implementation of this policy.
- 1.2 The Water Safety Management Plan (WSMP) will outline STAR's operational strategy for ensuring water safety, encompassing aspects such as monitoring, accountability, access procedures, and emergency protocols.
- 1.3 The operational procedures in the WSMP specify how Shropshire Towns & Rural Housing will fulfil the statutory obligation detailed in this policy, and as such, the WSMP is enforceable through this policy.

2. Introduction

- 2.1 Legionnaires' disease is a respiratory infection that can be contracted by inhaling tiny water droplets containing bacteria responsible for the infection. While it is rare, it can be extremely serious and is typically transmitted through contaminated water sources.
- 2.2 Legionella bacteria can survive in various environmental conditions but thrive in stagnant water with temperatures ranging from 20 °C to 45 °C. These organisms cannot survive temperatures above 60 °C and do not multiply below 20 °C, although they may remain inactive.
- 2.3 Legionnaires' disease is primarily contracted when individuals inhale small airborne water droplets (aerosols) containing the bacteria. The risk of infection is higher under the following circumstances: a) Water temperatures are between 20 and 45 °C. b) Deposits exist that can support bacterial growth. c) Aerosols can be generated and inhaled. d) Individuals, such as employees, residents, visitors, etc., have a higher susceptibility to infection due to factors such as age, illness, weakened immune system, and gender, with males being more vulnerable than females.
- 2.4 To minimize the risk, careful consideration must be given to water system design and operation, temperature control, water treatment and monitoring, as well as following recommended cleaning and disinfection procedures.

3. Policy Statement

- 3.1 STAR is dedicated, to the best of its abilities, to ensuring the health, safety, and well-being of individuals present on its premises. There is a foreseeable risk of harm associated with water systems in properties managed by STAR. As the legal Duty Holder for its premises, STAR acknowledges its responsibility to safeguard its customers, employees, individuals working within STAR premises, and others from risks related to water systems.

- 3.2 The Regulator of Social Housing and Home Standard mandates that Registered Providers comply with all applicable legal requirements for ensuring the health and safety of customers in their homes, which includes the management of water systems.
- 3.3 In order to fulfil our statutory obligations regarding Water Safety, STAR will adhere to the Health and Safety Executive's "L8 Approved Code of Practice and Guidance - 2013" (L8 ACOP). To comply with the duties outlined in the L8 ACOP, STAR will:
- Identify and evaluate the sources of risk pertaining to legionella growth. This extends to evaluating the sources of risk of scalding based on tenancy risk category, and where higher risk tenancies which either have a shared or direct water supply, STAR will ensure that risk assessments are undertaken and where required TMV's installed, serviced and maintained as part of the current water maintenance regimes.
 - Engage qualified and competent contractors to conduct risk assessments, inspections, and maintenance of water systems.
 - Perform risk assessments every two years or more frequently if there are changes to the water system or if the existing risk control measures are deemed inadequate.
 - Develop a plan of action to prevent or manage the identified risks.
 - Implement, oversee, and monitor preventive measures.
 - Carry out necessary remedial actions recommended by the risk assessor.
 - Maintain accurate records of precautions taken.
 - Provide training to individuals with delegated responsibility.

4. Related Documents

- L8 Approved Code of Practice and Guidance – 2013 (L8 ACOP)
- Control of Substances Hazardous to Health Regulations 2002
- Management of Health and Safety at Work Regulations 1999
- The Guidance to the Water Supply (Water Fittings) Regulations 1999
- Reporting and Injuries, Diseases and Dangerous Occurrences Regulations 2013
- Housing Act 2004
- Health and Safety at Work etc. Act 1974

5. Scope of Policy

5.1 This policy applies to all STAR staff, contractors, and others carrying out works in STAR premises.

5.2 This policy applies to the following locations: -

- Rented properties including garages
- Communal areas.
- Offices and storage facilities.
- Commercial leaseholders where STAR retains the responsibility to maintain all or part of the building.
- Leaseholders and shared owners, living in self-contained accommodation, where STAR retains the responsibility to maintain all or part of the building.

5.3 We will undertake consultation as required with 'variable service charge payers', such as Leaseholders, on a works or contract-specific basis where works costs allocated per property are over £250, or £100 per annum under a qualifying long-term agreement. Details and procedures are within the Leaseholder Section 20 Consultation Policy.

6. Roles and Responsibilities

6.1 Accountable Person

Shropshire Towns and Rural Housing (STAR) operates as an Arm's Length Management Organisation, acting on behalf of Shropshire Council to oversee the upkeep and administration of the Council's housing assets. This delegation of authority is outlined in the Council's official policies, empowering STAR to manage these responsibilities efficiently. The Responsible Body ultimately remains as Shropshire Council.

6.2 Duty Holder

Duty Holder	Shrophire Towns and Rural Housing
-------------	-----------------------------------

The *Duty Holder* is responsible for

- Management of systems and equipment, and for
- Ensuring that appropriate measures are identified to adequately manage risk within all premises under STAR's control.
- Quality assurance of work carried out on systems and equipment by STAR employees and contractors and that all works conform to the relevant requirements.

The Managing Director holds ultimate responsibility for health and safety across the organisation and will nominate suitably qualified and experienced individuals to discharge those duties concerning water safety management.

The Board has the overall governance responsibility for ensuring that STAR is compliant with regulatory standards, legislation, and codes of practice. The role of the Board includes:

- Formulating key H&S policies
- Being cognizant of risks and risk controls in place
- Agreeing on performance targets and a performance monitoring framework
- Ensuring the availability of adequate resources and competencies for fulfilling policy commitments
- Ensuring suitable reporting and auditing activity
- Listening to the voice of customers

6.2 Under this policy, STAR has identified the following appropriate persons within the organisation to manage this area of risk with the support of appointed specialist contractors and consultants. Only competent and suitably qualified contractors will be appointed by STAR.

6.4 Policy Management and Assurance

Deputy Duty Holder	Position:	Operations Director
	Responsibilities:	Overall responsibility for the implementation of this policy and ensuring that adequate resources are made available to enable the policy objectives to be met. To ensure that appropriately qualified and suitably experienced people are employed to implement this policy, that appropriate programmes of work are in place to discharge relevant duties.
Responsible Person	Position:	Compliance Manager
	Responsibilities:	Ensuring the WSMP is implemented, relevant, current and practical. To ensure that all activity required for compliance with this policy is carried out.

		<p>Provision of quarterly performance reports to the Board as part of the governance framework.</p> <p>Reviewing the management plan every 12 months with all relevant parties to ensure the systems outlines in the plan are working.</p>
Competent Person	Position:	Compliance Officer
	Responsibilities:	<p>Administer associated contracts and act as the first point of contact for water safety related queries.</p> <p>Ensure effective management of STAR's water safety programmes and risk register.</p> <p>Guarantee that water safety information is available for relevant persons.</p> <p>Facilitating communication between the employees, contractors, water safety professionals and residents concerning matters related to water safety for locations within the scope of this policy.</p>

7. Policy Equality and Diversity Statement

- 7.1 STAR is committed to valuing and promoting equality, diversity, and inclusion across our services. We recognise our duty to eliminate unfair treatment and discrimination in the services we provide, and to promote and value respect in everything we do. We expect our staff to share these values and treat all customers with fairness and respect. We also require our contractors and suppliers to mirror our values and comply with our policies in this respect and their own respective duties.
- 7.2 STAR will uphold a zero-tolerance response to acts of discrimination.
- 7.3 STAR recognises that customers have different needs and may require a tailored and reasonable adjustment to our service to access our services or a property feature, either on a permanent or temporary basis.
- 7.4 STAR will ensure it meets its duties under the Equality Act 2010 to consider the need to:
- Eliminate discrimination, harassment, and victimisation

- Advance equality of opportunity
- Foster good relations between different parts of the community

7.5 All contractors employed by STAR or carrying out works on STAR managed premises are required to adhere to the commitments we have made to valuing and promoting equality, diversity, and inclusion across our services.

8. Communication

8.1 STAR will ensure that appropriate water safety information is provided to relevant persons on our website and upon request.

8.2 STAR will ensure effective emergency procedures are in place and that staff and contractors are clear on their responsibilities.

8.3 STAR will promote awareness of water -related risks through training and induction of relevant staff. The training will be designed to fit the needs and roles of the employees being trained.

8.4 To ensure that appropriate and suitable training is provided to staff, STAR will carry out training needs assessments where appropriate.

8.5 STAR has adopted and is undertaking surveys in accordance with the Regulatory standard tenant satisfaction measures. These will be utilised to address any reports on outstanding works, issues or concerns that warrant further action or learning and will be shared with our contractors' delivering services.

