



Water Safety Policy

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1. Policy Statement

- 1.1. HCHA is committed to protecting residents, visitors, colleagues and contractors from risks associated with water systems, including the risk of exposure to legionella bacteria. We will manage water safety in a proportionate, risk-based way across the homes and communal areas we own or manage.
- 1.2. Although we may appoint competent contractors to undertake risk assessments, monitoring, sampling, testing, cleaning, disinfection and remedial works, we retain overall responsibility as landlord and duty holder for ensuring that suitable arrangements are in place and that identified risks are managed.

2. Scope

- 2.1. This policy applies to all water systems within properties for which HCHA has repairing, management or control responsibilities, including individual homes, communal areas, offices, sheltered or supported accommodation, void properties, plant rooms, tanks, cylinders, calorifiers, pipework, outlets, showers, taps, external taps and any other equipment capable of creating or spreading water droplets.
- 2.2. The policy does not replace detailed site-specific risk assessments or written schemes of control. Those documents will set out the controls, monitoring frequencies and remedial actions required for each property or system.

3. Legal and Regulatory Framework

- 3.1. We will take account of relevant health and safety, housing and landlord obligations, including the Health and Safety at Work etc. Act 1974, the Control of Substances Hazardous to Health Regulations 2002, the Management of Health and Safety at Work Regulations 1999, the HSE Approved Code of Practice L8, HSE technical guidance HSG274, and applicable expectations of the Regulator of Social Housing consumer standards.
- 3.2. The organisation will apply this framework in a way that is suitable for a small landlord, focusing on clear accountability, competent advice, accurate records, timely action and assurance that outsourced services are effective.

4. Roles and Responsibilities

- 4.1. The following roles have key responsibilities
 - Board: Has overall responsibility for ensuring that effective water safety arrangements are in place, adequately resourced and subject to appropriate oversight.
 - Duty holder and responsible person: Deputy Chief Executive is the nominated duty holder for water safety. The Property Services Coordinator is the responsible person for day-to-day coordination of this policy, including maintaining the water safety register,

- arranging competent contractor support, reviewing reports, tracking remedial actions and escalating issues.
- Employees and Contractors: Employees must report suspected water safety issues promptly, including poor temperatures, scalding risks, damaged outlets, stagnant systems, resident concerns, access problems and missed contractor appointments. Contractors must work in accordance with their appointment, relevant legislation, recognised guidance, site risk assessments and agreed method statements.
 - Tenants and Residents: Report repairs and hazards, allow reasonable access for inspections and works, and follow safety information provided by the Association.

5. Contractor management and competence

- 5.1. Where specialist services are outsourced, HCHA will appoint competent contractors with suitable qualifications, experience, insurance, safe systems of work and quality assurance arrangements. Competence checks will be completed before appointment and periodically during the contract.
- 5.2. Contract specifications will clearly define the services required, reporting timescales, emergency arrangements, access expectations, record formats, escalation routes and responsibility for advising on remedial actions. Outsourcing specialist work does not transfer HCHA's duty to manage risk.

6. Risk assessment

- 6.1. Suitable and sufficient legionella and water hygiene risk assessments will be undertaken by competent persons for relevant properties and systems. Assessments will identify hazards, people at risk, existing controls, any further actions needed, priorities and review dates.
- 6.2. Risk assessments will be reviewed where there is reason to suspect they are no longer valid, following significant changes to a water system or property use, after relevant incidents, where monitoring indicates control failure, or at intervals set by the responsible person based on risk and competent advice.

7. Written scheme and control measures

- 7.1. For systems requiring ongoing control, we will maintain a written scheme setting out how risks will be controlled. This may include temperature monitoring, flushing, inspection of tanks and calorifiers, cleaning and disinfection, removal of redundant pipework, showerhead cleaning, sampling where required, remedial repairs and arrangements for void or low-use properties.
- 7.2. Control measures will be proportionate to the type and complexity of the system. In most routine domestic homes, risk is usually lower

where water is used regularly, but the landlord will still assess risk, act on known hazards and provide residents with appropriate information.

8. Monitoring, testing and remedial actions

- 8.1. Monitoring and testing will be carried out by competent contractors or trained staff in line with risk assessments and the written scheme. Any missed checks, failed results, access issues or suspected control failures must be recorded and escalated to the responsible person.
- 8.2. Remedial actions will be risk-rated, assigned to an owner, given a target completion date and tracked to completion. High-risk findings, positive legionella results, repeated access failures or overdue critical actions will be escalated to senior management and, where necessary, the board or governing body.

9. Access to homes

- 9.1. Residents will be asked to provide access for inspections, risk assessments, monitoring, testing and remedial works where required. We will make reasonable efforts to arrange appointments, explain why access is needed and support residents who may face barriers to providing access. Persistent failure to provide access will be escalated in line with tenancy conditions and the organisation's access procedure.

10. Voids, low-use properties and changes in occupancy

- 10.1. Void and low-use properties present increased risk because water may stagnate. We will identify such properties and apply appropriate controls, which may include flushing, draining, outlet checks, recommissioning procedures, risk assessment review, and cleaning or disinfection before reoccupation where advised by competent persons.

11. Resident information

- 11.1. We will provide residents with clear, practical information about water safety where relevant. This may include advice on regularly using taps and showers, reporting temperature problems, allowing access for checks, cleaning showerheads where this is a tenant responsibility, and telling us about extended absences or other circumstances that may affect water use.

12. Records

- 12.1. We will maintain accurate and accessible records of water safety arrangements, including risk assessments, written schemes, contractor competence checks, monitoring results, sampling results, remedial actions, access attempts, resident communications, incidents, assurance reviews and policy reviews.
- 12.2. Records will be retained for a period appropriate to the nature of the record, legal requirements and the organisation's document retention policy.

13. Incidents and emergencies

- 13.1. Any suspected water safety incident, significant control failure, confirmed contamination or report of illness potentially linked to a water system will be escalated immediately to the responsible person and senior management. The organisation will take competent advice, implement immediate control measures, communicate with affected residents where appropriate, cooperate with statutory authorities and record lessons learned.

14. Assurance and reporting

- 14.1. The responsible person will provide periodic assurance to senior management and the board. Reporting should include risk assessment status, monitoring compliance, overdue remedial actions, high-risk findings, contractor performance, access issues, incidents and any resource or governance concerns.

15. Training and awareness

- 15.1. Employees with water safety responsibilities will receive training or briefing appropriate to their role. This may include awareness of legionella risk, recognising warning signs, managing access, reviewing contractor reports, maintaining records and escalating concerns.

16. Policy review

- 16.1. This policy will be reviewed at least every three years, or sooner if there are significant changes in legislation, regulatory expectations, organisational structure, stock profile, contractor arrangements, incidents or competent advice.