

Water Safety Policy

Category	Health & Safety
Lead	Director of Asset Management
Committee / Approver	Service Delivery Sub Committee
Action	Review & Approve
Review Date	August 2026
Review Due	August 2030
Purpose	To outline AHA's duties around water safety
Internal/External	External

Purpose

The aim of this Policy is to ensure the effective inspection, maintenance and management of all water systems within premises controlled by the Organisation.

The procedures detailed within this section have been written to ensure all reasonable steps have been taken to comply with The Health and Safety at Work Act 1974 , 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 Association recognises that certain individuals may be more vulnerable to the effects of Legionella and other waterborne hazards. In implementing this policy, the Association will have due regard to the needs of vulnerable tenants, supported accommodation residents and individuals with protected characteristics and will make reasonable adjustments where appropriate.

AHA's Corporate Responsibility

AHA is responsible for ensuring that the Legionella risk is controlled within our properties.

AHA will ensure that adequate resources are available for formulating, monitoring and recording appropriate procedures that comply with the Approved Code of Practice (ACOP). The Association will also ensure that adequate resources are available to provide appropriate information, training and supervision of staff with an identified role in implementation legionella management procedures.

Definitions

Legionella	A potentially dangerous type of bacteria when inhaled with water vapour. Bacterium grows best in warm, nutrient rich water
Legionnaires' disease	A potentially fatal form of pneumonia caused by the legionella bacteria
Legionella Risk Assessment	A specific risk assessment carried out to determine the risk level of Legionella Assessment proliferation, and exposure from a specific water system
Log Book	A record book provided to record all local checks and tests carried out, as specified by legionella risk assessment
Portal	Contractors on line portal provided to record all local checks and tests carried out, as specified by legionella risk assessment

References

- British Standards 8580:2010 – Water Quality: Risk Assessment for Legionella
- HSG Health and Safety in Residential Care Homes (2001)
- HSG274 Legionnaires Disease – Technical Guidance (in 3 Parts) (2013)
- HSE Approved Code of Practice (ACOP) L8.
- IACL27 (rev2) Legionnaires Disease – A guide to Employers
- INDG 458 Legionnaires Disease – A brief Guide for Duty Holders (2012)
- Public Health etc. (Scotland) Act 2008
- The Building (Scotland) Regulations 2004 & 2022
- 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

Legal Duties

Under general health and safety law, duty holders including employers or those in control of premises, must ensure the health and safety of their employees or others who may be affected by their undertaking. They must take suitable precautions to prevent or control the risk of exposure to legionella

The Organisation has several specific legal duties which relate to water safety and, in particular, Legionella risk management. These include:

- Identifying and assessing sources of risk;
- Preparing a scheme for preventing or controlling the risk;
- Implementing and managing the scheme;
- Keeping records and checking what has been done is effective

Legionella Information|

Legionella bacteria is common in natural water (such as rivers and ponds). However, legionella can grow in other water systems such as cooling towers, evaporative condensers, showers, spray apparatus and hot and cold-water systems.

Legionnaires' disease is a potentially fatal form of pneumonia caused by the inhalation of Legionella bacteria. This includes the most serious Legionnaires' diseases, as well as the similar but less serious conditions of Pontiac Fever and Lochgoilhead Fever. The bacteria is normally contained within fine water droplets (aerosol) that may be caused by operating a cooling tower, shower, spray apparatus, running a tap outlet or operating a humidifier.

Legionnaires' disease has the potential to affect anybody. However, those more susceptible are normally in the age range of 45 and above, smokers, heavy drinkers, or suffer from chronic respiratory or kidney disease or have impaired immune systems.

Legionella survive low temperatures and thrive at temperatures between 20-45 degrees C if the conditions are right (e.g. if a supply of nutrients is present such as rust, sludge, scale and other bacteria).

Any water system that has the right environmental conditions could potentially be a source for legionella bacteria growth. There is a reasonably foreseeable legionella risk in your water system if:

- water is stored or re-circulated as part of your system;
- the water temperature in all or some part of the system may be between 20–45 °C;
- there are deposits that can support bacterial growth, such as rust, sludge, scale and organic matter;
- it is possible for water droplets to be produced and, if so, if they can be dispersed;

Legionella Policy

The Association will maintain a Written Scheme of Control for all water systems where identified by the Legionella Risk Assessment. The Scheme of Control will document the control measures, monitoring arrangements, inspection frequencies, responsibilities, remedial actions and record keeping requirements necessary to effectively manage Legionella risk.

To meet obligations, the Association will:

- Appoint 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 procedures;
- 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;
- Assess the level of risk through a structured Legionella Risk Assessment programme, and aim to eliminate or reduce the risk to an acceptable level;
- Arrange for routine inspection and maintenance of water systems, and where needed, a programme of disinfection;
- Instruct works to remove risk from shared water storage tanks or other systems and convert to mains supply to reduce the legionella risk.
- Maintain records of risk assessments, inspections, monitoring activities, maintenance, testing, remedial works, competency records and training for a minimum period of five years, or longer where required by legislation or organisational procedures.

Risk Assessment

Carrying out a legionella risk assessment and ensuring it remains up to date is required under health and safety law and is a key duty when managing the risk of exposure to legionella bacteria

The Organisation will arrange for a suitable and sufficient risk assessment programme to be carried out (and regularly reviewed) to identify and assess the risk of exposure to Legionella bacteria from all water systems across its property portfolio and offices under the control of the organisation.

The risk assessment will be reviewed at regular intervals (at least every 2 years) 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, where the results of checks indicate that control measures are no longer effective or following an incident/a case of legionnaires disease associated with the system).

Water Fittings and System Requirements

The Organisation will ensure that all water fittings comply with relevant legislation and have the CE mark, British Standard kitemark or appropriate equivalent. Specialist advice will be obtained in the selection of all water systems fixtures and fittings.

The Organisation will ensure that all water fittings are suitable for the purpose intended.

Hot water shall be stored in tanks with a designed temperature of at least 60°C. Water pipes shall be as short and direct as possible, and pipes and tanks will be effectively insulated. Tanks will be protected against contamination and materials used which do not encourage Legionella growth.

Hot water shall reach taps at temperatures greater than 50°C within 1 minute of running. Cold water shall be stored at a temperature of less than 20°C. Cold water shall reach taps at temperatures less than 20°C within 2 minutes of running. Outlets that are used infrequently shall be routinely flushed through.

Where water is used or stored for consumption in any devices, e.g. water coolers, tea urns, drinks machines etc., an effective system of regular cleaning and disinfecting shall be introduced, in accordance with manufacturer's instructions.

Disinfection

Water services will be disinfected when any of the following situations occur:

- If a routine inspection or risk assessment shows it necessary to do so;
- 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.

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.

To mitigate the increased potential risk associated with voids, we will carry out and record the following:

- Thoroughly flush all taps;
- Clean and disinfect, or replace, all shower heads;

All supported accommodation and Special Lets becoming void will be assessed individually based on the property type, risk profile, occupancy arrangements and support arrangements in place. Where support providers operate within Association-owned properties, responsibilities for water hygiene monitoring, flushing regimes, record keeping and reporting will be clearly defined through service level agreements, management agreements, facility-specific procedures or risk assessments.

Offices and Shared Facilities under AHA Control

In accordance with HSG274 the water systems installed at Angus Housing Associations offices and shared facilities are defined as a Gravity System with Recirculation. These include:

Angus Housing Association Head Office, Arbroath High Street
Russell Square, Arbroath
The Square - Dundee Office

Angus Housing Association will undertake temperature monitoring and water hygiene inspections at frequencies determined by the Legionella Risk Assessment and Written Scheme of Control. As a minimum, monitoring shall be undertaken in accordance with current HSE guidance and any recommendations arising from risk assessments.

Where risk assessments identify an increased risk profile or changes to the water system, monitoring frequencies may be increased accordingly.

Contractors

As a minimum requirement, contractors undertaking Legionella risk assessments, monitoring, inspection or remedial works must demonstrate competence through membership of the Legionella Control Association (LCA), Water Management Society (WMSoc), or an equivalent recognised accreditation body. Evidence of competency, training and insurance shall be maintained by the Association.

Notification Requirements

If it is suspected or confirmed that a tenant, employee or visitor has contracted Legionnaires' disease, the Organisation will report the incident to the HSE under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).

Where a suspected or confirmed case of Legionnaires' disease may be associated with an Association-owned or managed water system, the Association will cooperate fully with Public Health Scotland, the Health and Safety Executive, Scottish Water and any other relevant enforcing authority, and will implement any emergency control measures identified through investigation.

Tenant Responsibilities

Tenants will be provided with information on good water management and Legionella control through tenancy agreements and/or by means of information leaflets.

Tenants are advised to clean shower heads, descale and disinfect them at least every two months.

For showers that are only occasionally used, tenants are advised to flush the shower through by running the water for at least 2 minutes once a week.

Where a property is left vacant for any time (e.g. when on holiday), tenants are advised to flush both hot and cold water systems by running all outlets for at least 2 minutes.

Tenants should inform the Association immediately if there are problems, debris or discolouration in the water.

Named Responsibilities

Angus Housing Association's Board of Management is responsible for consideration and approval of this policy, and for ensuring that its decisions are taken in accordance with relevant legislation, regulatory expectations, training, and guidance.

The Chief Executive is the statutory duty holder in terms of health and safety.

The Director of Asset Management has operational responsibility and oversight for the implementation and delivery of health and safety across the business.

The Director of Asset Management, will be the 'responsible person' for the following:

- Management responsibility for all aspects of Legionella control;
- Ensuring appropriate arrangements are in place to identify AHA water systems and assess the potential risk of Legionella infection;
- Establishing appropriate arrangements to manage identified risk areas, including management capability and training;
- Deploying adequate resources to meet any priority needs identified through risk assessments;
- Reviewing risk assessments and implemented remedial measures at least every two years; and
- Ensuring procedures are kept up to date and shared with all key stakeholders.

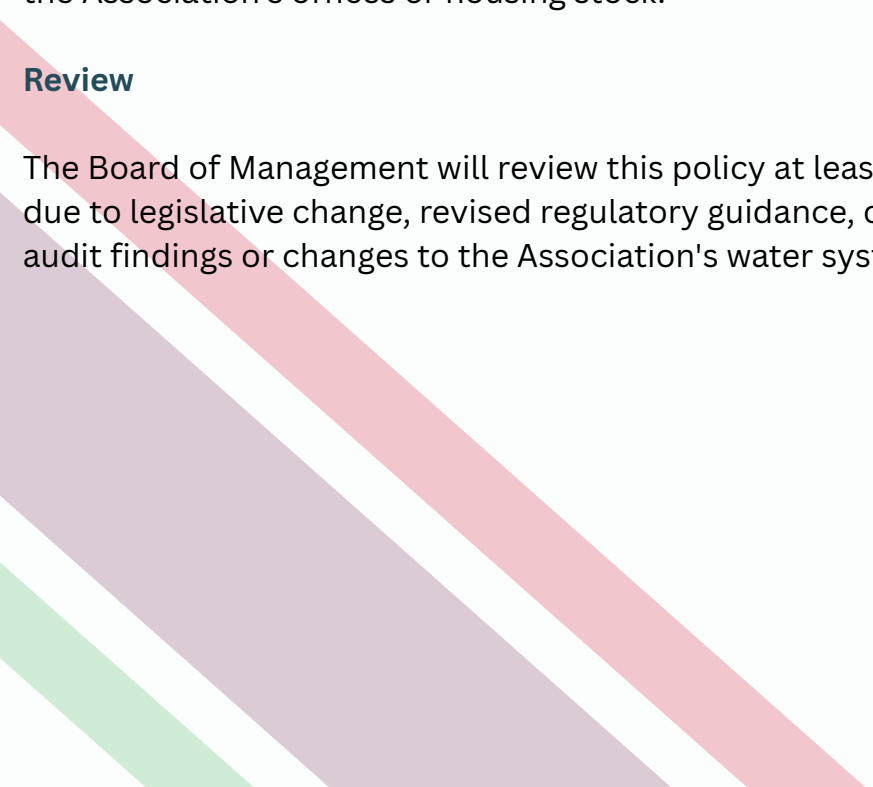
The Association will appoint a suitably competent Deputy Responsible Person who will undertake the duties of the Responsible Person during periods of absence or where operational circumstances require. The Deputy Responsible Person will be provided with sufficient authority, training and resources to fulfil these responsibilities.

Training

Training regarding Legionella awareness and management will be carried out where specifically identified and on a regular basis. Training will be the responsibility of the Director of Asset Management and will encompass all staff that will possibly encounter legionella situations within the Association's offices or housing stock.

Review

The Board of Management will review this policy at least every four years, or sooner where required due to legislative change, revised regulatory guidance, organisational change, significant incidents, audit findings or changes to the Association's water systems.





Scottish Charity Number SC020981
Scottish Housing Regulator HAL65
Financial Conduct Authority 1665RS
Property Factor Registration Number PF000129