





WATER HYGIENE SAFETY PROCEDURE

Contents



	1
1 OVERVIEW OF LEGIONELLA BACTERIA RISKS	4
2 INTRODUCTION.....	5
3 ROLES AND RESPONSIBILITIES.....	6
4 WATER RISK ASSESSMENTS (WRA'S)	9
5 DEVELOPMENT RISK CATEGORISATION & WRA REVIEW FREQUENCY.....	10
Higher Risk Properties:	10
Medium risk properties:	10
Low risk properties:.....	10
6 THE WRA PROGRAMME AND ACCESS PROCEDURES	12
7 MONITORING, TEMPERATURE CHECKING, FLUSHING & TESTING	12
8 UNDERTAKING WORK IN COMMUNAL AREAS, VOID PROPERTIES AND CUSTOMERS' HOMES.....	14
9 AMENDING THE WRA REGISTER.....	15
Adding a property	15
Converting, modifying or component replacement of communal water systems	15
New build contracts - initial Water Hygiene safety check	15
Deleting a property.....	16
10 QUALITY CONTROL.....	16
Checking WRA's, reviews and written schemes of control	16
Contractor's internal checks.....	16
External quality control	16
Contractor Management.....	16
Appointment of Contractors	Error! Bookmark not defined.
11 .MONITORING AND REPORTING	17
Key and Operational Performance Indicators (KPI's and OPI's)	17
Internal monitoring and reviews	18
Contract review meetings	18
12 EMERGENCIES, INCIDENTS, NEAR MISSES & ENFORCEMENT.....	18
13 Training	20

14	IMPLEMENTATION & REVIEW	21
15	Appendix A	23
		
	DM%20Clod%20and %20Hot%20Water%2	23
		
	DM%20Flushing%20 Master%20-%208%2(.....	Error! Bookmark not defined.

1 OVERVIEW OF LEGIONELLA BACTERIA RISKS

- 1.1 The bacterium legionella pneumophila and related bacteria are common in natural water sources such as rivers, lakes, and reservoirs, but usually in low numbers. Since legionella bacteria are widespread in the environment, they may also contaminate and grow in purpose-built water systems.
- 1.2 Legionellosis is the collective name given to the pneumonia-like illness caused by legionella bacteria. This includes the most serious Legionnaires' disease, as well as the similar but less serious conditions of Pontiac fever and Lochgoilhead fever. Legionnaires' disease is a potentially fatal form of pneumonia, and everyone is susceptible to infection. However, some people are at higher risk, including:
- people over 45 years of age
 - smokers and heavy drinkers
 - people suffering from chronic respiratory or kidney disease
 - anyone with an impaired immune system.
- 1.3 Any water system that has the right environmental conditions could potentially be a source for legionella bacteria growth. There is a legionella risk in water systems in the following circumstances:
- Where water is stored or re-circulated as part of a system
 - When the water temperature in all or some part of the system is between 20–45°C
 - If there are sources of nutrients such as rust, sludge, scale, and organic matters
 - If it is possible for water droplets to be produced and if they can then be dispersed over a wide area e.g., showers and aerosols from cooling towers
 - In situations where people who are more susceptible to infection could be exposed to any contaminated water droplets.
- 1.4 The most common places where legionella can be found include purpose-built water systems, cooling towers, evaporative condensers, hot and cold-water systems, and spa pools. There are also a number of other systems that may pose a risk to exposure to legionella e.g., humidifiers, air washers, emergency showers, indoor ornamental fountains etc.

Eliminating risks

- 1.5 Wherever possible, foreseeable risks arising from legionella bacteria will be eliminated. Examples of how this can be achieved include the following:
- Removing water storage tanks (where water pressure is sufficient)
 - Replacing water cylinders with combi boilers or other heating systems

- Removing infrequently used showers, taps and water fountains.
- Replacing plumbing components, fixtures, and fittings.
- Installing thermostatic valves.
- Cutting back redundant pipework to a shared supply where possible to avoid 'dead legs.

Written Scheme

- 1.6 Where it is not practicable to eliminate the risks from legionella bacteria in water systems, the HSE ACoP L8 requires that a 'Written Scheme' is put in place.
- 1.7 For all applicable developments, we will ensure that a Written Scheme is put in place which includes all of the following:
- A current plan showing layout of the water system, including parts temporarily out of use (a schematic diagram is adequate)
 - A description of the correct and safe operation of the system
 - The precautions to be taken including any physical treatments such as flushing the system or chemical treatments
 - Checks to be carried out to ensure the effectiveness of the Scheme and the frequency of such checks
 - Remedial actions to be taken in the event that the Scheme is shown not to be effective.

2 INTRODUCTION

- 2.1 This procedure should be read in conjunction with the Water Hygiene Safety Policy.
- 2.2 This procedure describes our arrangements for ensuring that:
1. Hanover comply with our legal duty under the Health and Safety at Work (etc) ACT 1974 (HASAWA) which requires employers to ensure the health, safety, and welfare at work for all employees and "others" which could be customers, contractors, visitors, or members of the public.
 2. Hanover will comply with The Management of Health and Safety at Work Regulations 1999 which places a duty to risk assess, in this case this is to assess the risks associated with water hygiene, legionella and scalding for hot and cold-water systems for all developments owned, managed, and operated by Hanover.
 3. Hanover will comply with The Approved Code of Practice (ACOP) Legionnaires' Disease: The Control of Legionella Bacteria in Water Systems (L8) which gives practical advice on Legionella control and how to comply with the law.

4. The required Water Hygiene safety checks are carried out as part of the management of void properties or before a mutual exchange.

2.3 It is Hanover's legal responsibility to ensure that:

- The risk of water hygiene and scalding within developments is suitably risk assessed
- An appropriate written scheme of control derived from the risk assessment, where necessary, is created to manage the risks of hot and cold-water systems
- Control measures and routine inspection, maintenance and monitoring is implemented as identified as being required by the risk assessment
- Records of control measures, inspections, maintenance, and monitoring are kept for all developments
- A responsible person to have day-to-day responsibility for controlling the risks from legionella is appointed within the organisation.

2.4 It is the customer's responsibility to provide access for the risk assessment and any subsequent maintenance or remedial works.

2.5 The water risk assessment programme is carried out on our behalf by an appointed contractor who is a member of the Legionella Control Association (LCA) or equivalent and meets all current competency requirements.

2.6 It is the responsibility of the managers on the development and on-site employees to carry out specific monitoring and flushing regimes as specified by the written scheme of control or by agreement with the compliance team. Training will be provided for such tasks to ensure they are carried out competently

2.7 All reasonable steps will be taken to ensure that all work (including risk assessments) required to be undertaken, are carried out by a competent person, who has appropriate skills knowledge and experience. In addition to our normal procedures on the appointment of contractors, Water Hygiene contractors will be required to provide evidence of LCA membership, Quality Control and Quality Assurance programmes, reporting mechanisms and previous similar contracts.

3 ROLES AND RESPONSIBILITIES

3.1 Day-to-day responsibility for the operation and monitoring of our water hygiene procedures and processes lies with the Repairs and Customer Safety Manager (R & CS Manager). However, all relevant employees have a responsibility to ensure that the procedures are applied as instructed.

3.2 Individual roles and responsibilities –

3.3 There are a number of roles and responsibilities for managing water hygiene as follows:

3.3.1 Chief Executive

- Monitors through the Director of Asset Management the implementation and effectiveness of Water Hygiene Policy and Procedures.

3.3.2 Director of Asset Management

- Monitors the implementation and effectiveness of the Water Hygiene Policies and Procedures on behalf of the Chief Executive
- Ensures all risks are advised to the Board

3.3.3 Head of Asset Management

- Responsible for the day-to-day performance of the water hygiene function within Hanover.

3.3.4 Repairs and Customer Safety Manager (R&CSM)

- The R&CS Manager is the internal 'responsible person.' In liaison with the Head of Asset Management develops and implement policies, procedures, and safe working practices when necessary to enable us to meet our obligations under all relevant legislation and regulations.
- Monitors the implementation of the Water Hygiene Policy and related procedures through line management to ensure compliance and reports to the Head of Asset Management on a monthly basis as a minimum.
- Works closely with other departments and Managers to ensure safe working practices across Hanover in relation to water hygiene.
- Communicates with other teams across Hanover as necessary to ensure regular and effective communication with regards to water regulations, modifications to existing hot and cold-water systems and design specifications relating to hot and cold-water system design.
- Keeps the business up to date with current and proposed water hygiene legislation.
- Ensures that the requirements of the policy and procedures are communicated to all relevant employees, reinforcing such communication on a regular basis.
- Ensures that all appropriate employees receive adequate water hygiene training and are encouraged to develop and promote safe working practices and attitudes towards water hygiene.

3.3.5 Customer Safety Coordinator (CSC)

- Responsible for ensuring compliance with our legal duty under the L8 ACOP for risk assessing and maintaining hot and cold-water systems within all developments
- The CSC ensures that all persons or contractors carrying out Water Risk Assessments (WRAs) and subsequent remedial works are trained and competent to do so and are members of the LCA or equivalent.

- The CSC carries out day to day monitoring of the WRA programme to minimise the risk and ensure the access procedure is followed
- Advises the R&CSM of any planned forced accesses in advance
- Audits on a risk-based approach as required using a 3rd party suitably competent independent contractor or suitable inspecting body.
- Ensure weekly updates on the water hygiene servicing programme are reported to the R&CSM /HoAM and monthly through the performance framework to SMT.
- Flags any significant failures in meeting the management arrangements or written scheme of control to the R&CSM as a priority and risk assesses the situation to assist the R&CSM with determining the best course of action to mitigate risk.

- 3.3.6 **Customer Safety Assistant** - Responsible for assisting the CSC for ensuring compliance with our legal duty under the L8 ACOP for risk assessing and maintaining hot and cold-water systems within all developments. Carrying out the day-to-day management of the WRA programme and flagging any issues with the Customer Safety Coordinator immediately. They will also be responsible for raising and monitoring remedial works, maintenance, monitoring and flushing regimes.
- 3.3.7 **Repairs Supervisor** – Overseeing and auditing the void process for risk assessing void properties and managing controls during the void property period and actioning any issues raised. Supporting the Customer Safety Coordinator with any issues relating to the void regimes and remedial works required.
- 3.3.8 **Repairs Advisors** - Responsible for instructing any modifications to the hot and cold-water systems and any schemes of control to maintain water hygiene during the void period or during a mutual exchange. They will ensure that the appropriate records are kept on site for each person carrying out work and once the work is completed. Once the void is completed the records will be handed over to the Housing Team for them to continue regimes until the new customer moves in.
- 3.3.9 **Admin Assistant** – Providing support to the Customer Safety Assistant as required. Including assisting with data storage, customer communication and letter management.
- 3.3.10 **Housing Officer** – Having line management of the Development Managers, in their absence they will make arrangements for access to properties, flushing and monthly checks (temperature monitoring, sentinel points etc).
- 3.3.11 **Development /Very Sheltered/Housing with Care Manager** – Assisting with access to properties and carrying out flushing and monthly checks specified in the WRA or written scheme of control (temperature monitoring, sentinel points etc) where instructed.
- 3.3.12 **Risk Assessment Contractor** – Responsible for delivery of the WRA programme and raising any concerns which may impact it at the earliest opportunity. Developing a specific written scheme of control for each development. Highlighting any remedial works with a priority timescale for completion by the remedial works contractor

3.3.13 **Remedial Works Contractor** – Responsible for delivery of the remedial works resulting from the WRA programme. They also must ensure that all Water Hygiene remedial works are carried out in line with L8 ACOP, HSG274 and water regulations and all engineers are trained to the required level.

4 WATER RISK ASSESSMENTS (WRAS)

4.1 Water Risk Assessments (WRAs) are the principal means by which we identify, evaluate, remediate, and manage all water safety and hygiene hazards in our developments (communal and domestic areas).

4.2 An initial WRA will be carried out for all developments. The purpose of a WRA is to establish all of the following:

- Identification of the water sources and systems within our properties, including potential conditions for the growth of legionella bacteria.
- Identification of customers who may be at risk from legionella bacteria and why they may be at risk.
- Evaluation of water safety and hygiene risks, including the adequacy of water safety and hygiene measures, testing, inspection, and maintenance.
- Identification of any remedial actions which are required to prevent scalding or prevent and eliminate the growth of, and human exposure to legionella bacteria.

4.3 WRAs will be individually compiled for each development and will be property-specific due to the complexity and unique design or use. These will be added to the WRA register (see section 9)

4.4 Water hygiene risk assessments will contain all of the following information:

- Description of the location and property.
- Identification of hazards.
- People at risk.
- Hazard control measures.
- Water hygiene management.
- Schematic drawing of water system.
- Summary of water safety and hygiene risks and of existing control measures.
- Number of employees.
- Number of customers.
- Building use

- Priority issues within the building.
- Actions and recommendation.
- Building water safety and hygiene risk rating.
- Date and time of assessment.
- Name and signature of the assessor.

5 DEVELOPMENT RISK CATEGORISATION & WRA REVIEW FREQUENCY

5.1 Following the completion of an initial risk assessment, all developments will be categorised as being higher, medium, or low risk. These are defined as follows:

Higher Risk Properties:

- Housing with Care schemes
- Very sheltered schemes
- Sheltered schemes.
- HMOs supported living.
- General needs blocks containing shared tanks.

Medium risk properties:

- General needs blocks with tanks.
- Amenity individual homes with tanks
- General needs individual homes with tanks.

Low risk properties:

- Amenity individual homes without tanks. (Combi-boilers)
- General needs individual homes without tanks. (Combi-boilers)

5.2 After the initial full WRA is produced the review frequency specified by the competent assessor will be reviewed by the R&CSM and CSC to determine the frequency. No communal WRA review period will exceed 2 years (not statutory).

5.3 All categorised higher risk and medium risk properties will have a physical “on site” WRA review, carried out by a suitably competent person (with sufficient skills, knowledge experience and behaviours), at the premises and within the timescales derived from 5.2.

5.4 Properties can be considered “low risk properties” where there is evidence of a combi boiler to individual dwellings with no stored water and without any communal aspects of the property and where the customers do not have any susceptibilities to ill-health from water hygiene. For example, a general needs individual property with a

combi boiler and no other stored water would be deemed low risk. Alternatively, if there is an amenity property with a customer with notable health issues that may not be using the water systems frequently and therefore stagnating water, may need to be considered for further control measures.

5.5 All properties which have been evidenced as “Low Risk properties,” will not need any further action, unless the circumstances of the property, it’s occupants' circumstances or health changes, then the risk will need to be reviewed.

5.6 Any WRA will be reviewed when there is reason to suspect that it is no longer valid, or there has been a significant change in the property that has affected the water safety and hygiene measures. Reasons for review could include any of the following:

- A change of use of the property or the introduction of a new water system.
- Alterations to the property (including those carried out by a customer with or without our agreement).
- Changes to water-related fixtures or fittings.
- The failure of water safety and hygiene precautions.
- A significant reduction in the numbers of people using the building.
- A change in the customer profile or composition of people using the property.
- A water safety and hygiene incident or significant ‘near miss.’
- Issues arising from other water safety and hygiene risk assessments.
- Any other change which could impact on water safety and hygiene within the property.
- If there is a confirmed positive sample of Legionella

5.7 Reviews of water safety and hygiene risk assessments should include all of the following elements:

- To identify if there have been any changes in the property that has affected the water safety and hygiene measures.
- To check that the Written Scheme (see section 1.6-1.7) is being complied with.
- To check that the expected monitoring has taken place and all records (including in the development logbook) are up to date.
- To check if any remedial works arising from the previous risk assessment have been carried out.
- To confirm that the specialist water safety and hygiene contractor has carried out its statutory visits.

6 THE WRA PROGRAMME AND ACCESS PROCEDURES

- 6.1 Hanover will keep a “WRA Register” of all known properties both at block and domestic unit level for all developments. This will be used to derive the annual programme each financial year based on the review frequency for each WRA falling due within that financial year.
- 6.2 The WRA contractor will be provided with a full programme of risk assessments and reviews at the beginning of the financial year.
- 6.3 To ensure the WRA and WRA review is completed within the required timescales, these should be programmed at least one month in advance of the anniversary date.
- 6.4 The CSC will ensure the contractor has full contact details to contact customers as well as contact details for each housing officer and managers on the development.
- 6.5 The CSC will share the programme of WRAs and reviews with all relevant care, factoring, housing employees and managers of each development.
- 6.6 The contractor will work with housing and managers on the developments to gain access. When a customer will not allow access, the managers will use all resources at their disposal to assist the contractor in gaining access.
- 6.7 Any WRAs which are not completed by the anniversary date due to access issues will be recorded on the OPI/KPI scorecard.
- 6.8 Following the WRA or WRA review, the assessor will complete the risk assessment. They will keep the CSC notified of progress with completions and ensure the assessment or assessment review is sent to the CSC within 14 days of completion.
- 6.9 All remedial actions which are identified during a water safety and hygiene risk assessment or review, and which are accepted will be categorised according to their level of risk.
- 6.10 The level of risk will determine what action will be taken and the timescale for the action to be resolved. This will be determined by the responsible person in conjunction with the findings of the Water Risk Assessment.
- 6.11 Actions considered to be ‘immediate’ risk will be escalated to the responsible person before the assessor leaves the site.

7 MONITORING, TEMPERATURE CHECKING, FLUSHING & TESTING

- 7.1 There are a range of ways in which water systems in our developments will be monitored, tested, and inspected. This will be based on the risk assessment and the written scheme of control. This can be carried out by contractors or appropriately trained employees and will be specific to the property and can include any of the following:
- Checking the temperature and flow of water where it is stored and distributed including thermostatic mixing valves.
 - Monitoring whether the demand for water has changed.

- Checking cleanliness of water systems for nutrient sources, water stagnation and growth of biofilms.
- Flushing water services.
- Cleaning and disinfecting water services.
- Sampling and testing for legionella bacteria in water systems.

- 7.2 Water systems installed in our developments will be tested in accordance with the manufacturer's instructions and relevant regulations and codes of practice, including HSG274 Part 2: 2014 and BS8558. This includes testing and inspection frequency and the type of testing and inspection that takes place.
- 7.3 We operate a mixed approach where the method of testing, monitoring and inspection is undertaken by our employees, appointed contractors, or the suppliers of the systems. All work will only be undertaken by competent employees and contractors. They will need to have provided evidence of their competency prior to undertaking any testing and inspection.
- 7.4 Testing, monitoring and inspection arrangements for each development carried out by employees will be specified in templates (**see Appendix A**) and they will be based on our water safety and hygiene risk assessments and Written Schemes. Contractor templates will need to be agreed with the CSC and R&CSM
- 7.5 All testing and inspection activities and remedial actions which are identified during testing and inspection of water systems (both internally and externally delivered) will be recorded within the new compliance system.
- 7.6 If a tank is found to require cleaning, an assessment should be carried out by the Customer Safety Coordinator or Customer Safety Officer to determine what action is required. Drinking water should be supplied immediately via bottled water and tank cleans should be complete within 3 days.
- 7.7 Where possible, Hanover are working towards connecting supplies directly to mains to reduce the legionella risk.

Design and installation of water systems

- 7.8 Water systems in complex buildings will be designed and installed on our behalf by competent organisations (system designers, engineers, contractors). This includes the specification, design, installation, and commissioning of the water systems. Where beneficial, we will also work in partnership with the manufacturers of water systems.
- 7.9 Water systems which are solely for use within a customer's home and not shared with other customers, will be designed, and installed in accordance with CDM Regulations.
- 7.10 Specifications and designs must, as a minimum, meet all required legislative and regulatory standards.
- 7.11 From time to time, we may utilise the support of specialist water safety and hygiene

consultants to provide independent assurance on the design and installation of water systems.

8 UNDERTAKING WORK IN COMMUNAL AREAS, VOID PROPERTIES AND CUSTOMERS' HOMES

- 8.1 Various work is undertaken on hot and cold-water systems within our developments, including communal areas and customers' homes by our approved contractors, which may be appointed directly to undertake work, or they may be subcontracted.
- 8.2 The nature of the work and the potential risks to the integrity of water systems from legionella bacteria will both affect how work is undertaken.
- 8.3 All repairs or servicing for hot and cold-water systems delivered by our contractors, including void repairs, must be undertaken by operatives who have received and documented specific water safety and hygiene training which is appropriate to their role e.g., water regulations.
- 8.4 Where there is any risk that the integrity of any water system has been or could be compromised by undertaking the repair or servicing, it is essential that the issue is brought to the attention of the 'responsible person' as a matter of urgency. This is to enable further investigation and a suitable course of action to be implemented.
- 8.5 Risk assessments should be carried out on all planned works where modification of any hot and cold-water system will occur (e.g., kitchens and bathrooms). These must include the risk from legionella bacteria in water systems and scalding, taking account of the property and customer profile, and provide confirmation that risks are minimised or appropriately mitigated.
- 8.6 In addition, before work can commence, checks must be made of existing drawings, records and the relevant water safety and hygiene risk assessment to ensure that the proposed work will not compromise water safety and hygiene arrangements that are in place.
- 8.7 Planned works are only undertaken by approved contractors. In order to obtain assurance of the competence of a contractor's workforce, it will be necessary for the contractor to have supplied sufficient information to evidence competency of its employees and the ability to manage risk (e.g., appropriate RAMS).
- 8.8 Once works are underway, and at their completion, checks will be carried out to ensure that any risks are being managed and that the work is not compromising water safety and hygiene arrangements. This is a central aspect of our approach to contract management.
- 8.9 For difficult to access tanks, we must provide the contractor with a safe route to access in the form of flooring and lighting.

Void properties

- 8.10 As a general principle, outlets on hot and cold-water systems should be used at least once a week to maintain water flow and avoid stagnation. Void properties which are unoccupied for extended periods of time may present an increased risk from legionella bacteria. These could be void properties that are hard to let, those that

require major works, or properties that have been decanted pending refurbishment, demolition, or disposal.

- 8.11 Void properties will be subject to a risk assessment relating to potential legionella bacteria in water systems, taking account of the property, length of time it will be unoccupied and the profile of the new customer. Normally the property will not be re-occupied within 1 week therefore consideration to implement a suitable flushing regime or draining the system down if left for longer periods time.
- 8.12 The risk assessment must provide confirmation that risks are minimised or appropriately mitigated before the new customer can become the lawful occupier.

9 AMENDING THE WRA REGISTER

Adding a property

- 9.1 A property will be added to the WRA register as a result of:
- a) completion of a new-build project;
 - b) installation or modification of a communal hot and/or cold-water system
 - c) any modification to a low-risk property which recategorises it to medium or high risk
 - d) purchase or transfer of a property
- 9.2 The first WRA for any new build properties will be carried out through the WRA programme and not by the developer. The developer will provide all schematics, “as-builts” and O&M manuals at practical completion.

Converting, modifying or component replacement of communal water systems

- 9.3 All proposals to convert, modify, or replace plant room components on a communal hot or cold-water system - whether under a planned maintenance contract, reactive repairs, or an approved customer alteration - must be authorised by the Planned Maintenance Manager or R&CSM before work commences.
- 9.4 All work outlined in 9.3 must be carried out by the Planned Maintenance Team (PMT) and following completion, the PMT as appropriate will inform the Customer Safety Advisor or Customer Safety Coordinator to ensure that the property attribute details are updated on the WRA register and provide a copy of all completion certification and O&Ms.

New build contracts - initial Water Hygiene safety check

- 9.5 Part of the handover procedures for the new build development includes the handover of all information outlined in 9.2 to the Customer Safety Advisor and Customer Safety Coordinator. The New Build Team will send the Handover Form alongside the link to the appropriate paperwork, and this should be added to the WRA register. The CSC will ensure the new WRA is scheduled, and that all information received from the new build developer is shared with the WRA assessor.
- 9.6 The new build contractor will be responsible for all defects during the defect's liability period.

Deleting a property

- 9.7 Properties will be deleted from the annual schedule when they are sold or demolished.
- 9.8 When a property is sold the details including the date of sale will be sent to the Customer Safety Coordinator by colleagues in Finance. Authorisation should be confirmed with the R&CSM prior to deleting the property. On the sale date all outstanding repairs orders, including any scheduled WRA review or outstanding remedial works, will be cancelled and the relevant contractors will be notified.
- 9.9 The CSC will liaise with the Repairs Supervisor on the cancellation of works orders as required.

10 QUALITY CONTROL

Checking WRAs, reviews and written schemes of control

- 10.1 The CSC will receive and check WRAs, reviews and written schemes of control that all relevant sections have been completed, before passing them to the Customer Safety Assistant and Customer Safety Coordinator. Where required the CSC will follow up any errors or omissions with the relevant assessor.
- 10.2 If the Customer Safety Assistant or Customer Safety Coordinator has any query or concerns about the completion of a record, they will raise this without delay with the contractor.

Contractor's internal checks

- 10.3 The contractor will carry out their own quality control checks, selected at random, with a variety of checks being undertaken. The contractor will report on their internal checks at the contract review meetings when required.

External quality control

- 10.4 A programme of external quality control inspections can be undertaken as required by a specialist independent consultant appointed by Hanover. This contractor will be independent of the WRA assessor and the remedial works contractor. The CSC will supply the consultant with a selection of random addresses to carry out checks.
- 10.5 The consultant will review the quality of the WRA, written scheme of control (as applicable) and any remedial work identified.
- 10.6 The consultant will report on the results of each inspection programme to the CSC who will follow up any faults etc. directly with the WRA assessor.

Contractor Management

- 10.7 The CSC will check that all contractors are appropriately qualified and competent before carrying out any works. The contractor will supply a list of employees to be checked at the start of the contract and will update the list if any new employees carry out works. This is to ensure they are competent to carry out the works safely. The CSC will carry out a check to the list at least annually.

Appointment of Contractors

- 10.8 All water safety and hygiene risk assessments and reviews of risk assessments will be undertaken on our behalf by a competent and independent organisation who is appointed by the 'responsible person.'
- 10.9 As part of the appointment process section 57 of the L8 ACOP should be referenced when determining contractor competence. The risk assessors will remain independent and shall not be allowed to carry out remedial works identified.
- 10.10 The competence of the company will be demonstrated through membership of the Legionella Control Association (LCA) and undertaking the risk assessments in accordance with BS8580 and. LCA membership can be viewed by following this link: <https://www.legionellacontrol.org.uk>

11 MONITORING AND REPORTING

Key and Operational Performance Indicators (KPIs and OPIs)

- 11.1 OPIs - The Customer Safety Advisor will monitor weekly progress with all contractors for all programmes of work, logging completed works, reviewing evidence of completions and updating the Water Hygiene Risk Assessment register for:
- Water Hygiene Risk Assessment and Review Programme
 - Water Hygiene schemes of control logs (contractors and employees)
 - Water Hygiene remedial programme.
 - Monthly reporting will be produced by the Customer Safety Coordinator for the Repairs and Customer Safety Manager for all water hygiene programmes listed above which will be reviewed. Any issues experienced within the month, preventing work from being achieved within target date, will have reasons reviewed so that an appropriate commentary can be applied when KPIs are being compiled.
- 11.2 Key Performance Indicators (KPIs) - The Repairs and Customer Safety Manager (R&CSM) will agree the KPIs required by SMT, ELT and Audit, Performance and Risk Committee (APR). The OPI data will be used to populate the KPI requirements for these stakeholder groups and will apply commentary determining compliance within target date and any reasons for not achieving compliance. Core KPIs are set out below, which can be added to with authorisation from the R&CSM:
- Total number of communal areas requiring a WRA/review
 - Total number of domestic areas requiring a WRA/review
 - Number of communal areas requiring a WRA/review during the reporting period which were completed and not completed;
 - Number of domestic properties requiring a WRA/review during the reporting period which were completed and not completed;

- Number of communal actions resulting from a WRA/review;
- Number of domestic actions resulting from a WRA/review

Internal monitoring and reviews

- 11.3 Water Risk Assessment (and review) Due Date Report – This will be run monthly by the Customer Safety Assistant or Customer Safety Coordinator. Any visits which have not been marked complete should be investigated with the contractor, reasons will be logged, and the system updated.
- 11.4 Remedial Works Report – The Customer Safety Coordinator will run a report each month for newly completed risk assessments and reviews of risk assessments to identify any new remedial works which will be verified and instructed to the relevant colleague or contractor.
- 11.5 Contractor Weekly No Access Update – All contractors will provide a weekly no access report to the Customer Safety Advisor and Customer Safety Coordinator. The Customer Safety Advisor and Customer Safety Coordinator will manage the no access, liaising with manager of the development and Housing Officer to assist in gaining access as required.

Contract review meetings

- 11.6 The CSC will hold monthly meetings with the WRA contractor and the remedial contractor to monitor progress with the current WRA programme and remedial programme, consider quality control reports and deal with any concerns, issues etc. The meetings will normally follow a standard agenda including performance, financial and health & safety matters.
- 11.7 The meetings will be minuted with copies being circulated to all present and a copy being added to the relevant contract file.

Internal Auditing

- 11.8 The CSC will carry out a monthly check to the Water Hygiene inspection register by cross referencing the individual boiler property address on Capita Open Housing Report and the Contracts Master List to ensure that any deletions or input errors are found and corrected.
- 11.9 The R&CSM will carry out an annual audit of the WRA register alongside WRAs to identify if the anniversary dates coincide.
- 11.10 The Health, Safety and Wellbeing Manager will carry out a minimum of quarterly checks of the on-site monitoring, temperature checks and flushing regimes against the data log entries.

12 EMERGENCIES, INCIDENTS, NEAR MISSES & ENFORCEMENT

- 12.1 The Business Continuity Plan (BCP) details arrangements and processes to follow in the event of a major emergency (unplanned event) It covers our emergency response, major incident management and recovery, and full-service resumption and return to business as usual.

- 12.2 We will liaise with and notify HSE and any other enforcing authority when required relating to hot and cold-water systems.
- 12.3 The Responsible Person (or in their absence, the Head of Asset Management) is responsible for reporting incidents to the HSE as required (including RIDDOR reportable incidents), and for managing contact with the HSE and other statutory bodies.
- 12.4 We will work closely with the relevant local water authority, HSE, local authorities and other statutory bodies to obtain their advice and assistance in relation to water safety and hygiene in our properties. This can include audits and inspections of our properties and water systems and promoting water safety and hygiene awareness amongst our customers.
- 12.5 We will respond promptly and positively to any enforcement or improvement action that is taken by a statutory body. Our response will include the following:
- We will review the conclusions of the statutory body and engage with them if we have reason to challenge or seek clarification of their conclusions and/or requirements.
 - We will ensure that requirements are addressed within the specified or agreed timescale.
 - We will identify if there are similar issues within our other properties. If so, we will take appropriate remedial action.
 - Full details will be recorded and reported to the Responsible Person, ELT and as required, the Chief Executive Officer.
- 12.6 All water safety and hygiene incidents, including near misses, will be logged including details of any follow-up actions. This may include, but is not limited to the following:
- Undertaking remedial work.
 - Investigating the circumstances that led to the incident.
 - Undertaking remedial action that is required to improve water safety and hygiene at the location of the water safety and hygiene incident and at other properties.
 - Communicating with customers to improve water safety and hygiene awareness.
 - Working with the relevant local water company, police, HSE or other statutory agencies.
 - Making a claim with our insurers.
- 12.7 We will review all incidents, including near misses, (particularly those where claims are made) to ensure that any lessons learnt are reflected in updates to policies, procedures and working practices in order to reduce the number of incidents and near misses and to mitigate our liability.

- 12.8 In the event of any confirmed instance of Legionella at any Hanover development, we will attend as soon as is reasonably practicable and take samples from the reported hot and cold-water systems and send these for analysis. As soon as samples have been taken a full chlorination will be completed. If any customers, employees, or others complain of any health effects, insist they seek immediate medical attention, telling the medical professionals that they have suspected exposure to Legionella bacteria. The results will be obtained efficiently, and any further action required should be taken. We will share results if requested by any enforcing authority.
- 12.9 In the event drinking water is impacted, suitable bottled water should be supplied immediately to ensure residents on site have access to drinking water. This should be confirmed by the Customer Safety Coordinator for action by the manager on site or housing officer.

13 Training

- 13.1 The R&CSM is the named responsible person within Hanover and is responsible for the development of systems and processes to provide a robust, effective, and efficient compliance methodology to ensure compliance is met by Hanover and the safety of our customers is maintained at all times. The training course the R&CSM is required to obtain is the Management and Control of Building Hot and Cold-Water Services (BOHS P901).
- 13.2 The CSC is the named competent person and hold responsibility for the day-to-day management of the WRA programme. The training course the CSC will require to obtain is the Management and Control of Building Hot and Cold-Water Services (BOHS P901)
- 13.3 For employees receiving repairs and emergency calls, to ensure competency, understanding and how to appropriately triage and correctly identify the nature of the problem reported, the repairs team will have to complete the following:
- Read, understand, and sign acknowledgement of Hanover's Water Hygiene Safety Policy and this Procedure
 - E Learning as required
- 13.4 For employees involved in Repairs/ Remedial work, to ensure competency, understanding and how to instruct work efficiently and accurately, they will have to complete the following:
- The Building Services Officers, Contracts Officers, Customer Safety Assistant & Customer Safety Co-ordinator will be required to complete the training and have the knowledge and understanding as stated in 13.6
 - The Building Services Officers, Contracts Officers, Customer Safety Advisor & Customer Safety Co-ordinator are fully conversant on how to manage/ address remedial works highlighted during WRAs.

Job Role	Briefing on Hanover Policy, Procedure & Emergency procedure	E Learning Water Hygiene
Repairs employees	X	X
Telecare and Development employees	X	
Contract Officers & Customer Safety Assistant	X	X
Building Services Officer	X	X
Head of Asset Management & Sustainability, Customer Safety Co-ordinator & Health, Safety & Wellbeing Manager	X	X
Repairs and Customer Safety Manager	X	X

14 IMPLEMENTATION & REVIEW

- 14.1 The Director of Asset Management is responsible for ensuring that this procedure is implemented by all concerned.
- 14.2 The Repairs and Customer Safety manager will ensure that this procedure is reviewed at least annually.

Department	Asset Management
Author	Repairs and Customer Safety Manager
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Approved by	Clare Dodd
Next Review Due	July 2024

Appendix A - Legionella Preventative Monitoring/Checks Form



DM Checks

Appendix B – Weekly Flush and Purge Form



DM Flushing Master
- 8 Week Sheet.xlsx

Appendix C – Written Scheme of Control (Hanover)



WRITTEN SCHEME
LEGIONELLA 20231.docx