



London Borough
of Hounslow

WATER HYGIENE POLICY

Assistant Director for Asset Management & Programme Delivery

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Policy Document Content

1.0	Introduction	2
2.0	Aims and Objectives	2
3.0	Scope.	2
4.0	Legislation.	2
5.0	Policy Statement.	3
6.0	Roles & Responsibilities.	4
6.1	Chief Executive Responsibilities.	4
6.2	Assistant Director for Asset Management & Programme Delivery.	4
6.3	Property Compliance Team.	4
6.4	Asset Management Team.	5
6.5	Directors and Head of Services.	5
6.6	Managers.	6
6.7	Employees.	6
6.8	Corporate Health and Safety Team.	6
6.9	Housing Management Team.	7
7.0	Management Arrangements	7
7.1	Risk Management and Water Risk Assessments.	7
7.2	Written Scheme of Control.	8
7.3	Training provision.	8
7.4	Policy Review.	9

1.0 Introduction.

- 1.1 The London Borough of Hounslow is committed to act as a Responsible Landlord and fulfil its legal obligations, in compliance with the HSE Approved Code of Practice L8 - Legionnaires disease – The control of legionella bacteria in water systems-, the Control of Substances Hazardous to Health Regulations 2002 (COSHH 2002) and all other related regulations and standards.

2.0 Aim and Objectives.

- 2.1 This policy aims to outline the arrangements to managing water hygiene within the London Borough of Hounslow owned and managed properties.
- 2.2 This policy also aims to underscore key roles and responsibilities in ensuring compliance with the Legionnaires disease – The control of legionella bacteria in water systems and other water hygiene related regulations and standards.

3.0 Scope.

- 3.1 This policy applies to the London Borough of Hounslow owned and managed residential buildings and corporate properties and to any property, where the London Borough of Hounslow has a legal responsibility for maintenance and repairs.

This includes and not limited to the following:

- General Needs.
- Supported Housing and Sheltered Housing.
- Offices and Depots.
- Community Centres.
- Libraries and Leisure Centres.
- Schools and Education Premises.
- Retail or Commercial Units.

4.0 Legislation.

- 4.1 London Borough of Hounslow shall comply with the following Legislation;
- Control of Substances Hazardous to Health Regulations 2002.
 - Health and Safety at Work etc. Act 1974.
 - Management of Health and Safety at Work Regulations 1999.
 - The Health and Safety Executive (HSE) L8 (Fourth Edition) – Approved Code of Practice and Guidance 2013 – Legionnaires Disease – the Control of Legionella Bacteria in Water Systems.
 - BS 8580 : 2019 Water Quality – Risk Assessments for Legionella Control. Code of Practice.
 - Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).

5.0 Policy Statement.

- 5.1 London Borough of Hounslow acknowledges its responsibilities for the management of water hygiene and prevention of legionella within its water systems, as outlined in

the Health and Safety Executive (HSE) L8 (Fourth Edition) – Approved Code of Practice and Guidance 2013 – Legionnaires Disease – the Control of Legionella Bacteria in Water Systems.

5.2 London Borough of Hounslow is committed to eliminate and reduce - *as far as is reasonably Practicable*- the risk from legionella bacteria by;

- Successfully appointing of Competent Person to be operationally responsible for the implementation of the Council legionella prevention management plan.
- Identifying and assessing the risk of legionella by implementing a water hygiene risk assessment programme on all the Council's owned and/or managed buildings identified to be presenting such a risk.
- Developing and maintaining a written scheme of control, for the prevention of any risk associated with the water systems running through London Borough of Hounslow's buildings, as well as the hazards identified in the water risk assessments.
- Successfully implementing, managing and monitoring all precautionary measures and recommendations arising from water hygiene risk assessments.
- Commissioning a competent and appropriately qualified contractor(s) to complete the water hygiene risk assessments and subsequent actions arising from these risk assessments.
- Providing adequate information, instruction and training to all building managers and anyone engaged in routine water hygiene tasks and checks.
- Completing a suitable and sufficient review of water hygiene risk assessments on a recommended 2 yearly cycle or at the assessors recommended review due date or when a water hygiene related major incident occurs.
- Preparing -where applicable- schematic drawings of the hot and cold-water installations for water systems, installed within the Council's identified properties in scope.

6.0 Roles and Responsibilities.

6.1 Chief Executive.

- 6.1.1 The Chief Executive is the Responsible Person and has the overall responsibility and accountability for Water Hygiene within the Council's owned and managed property portfolio that had been identified to be requiring a water hygiene management and where the Council has a landlord responsibility.
- 6.1.2 The Chief Executive is responsible for providing strong leadership in the management of Water Hygiene issues and ensuring Directors take ownership of water hygiene and the prevention of legionella matters within their respective areas of responsibilities.

6.2 Assistant Director for Asset Management & Programme Delivery

- 6.2.1 The Assistant Director for Asset Management & Programme Delivery shall hold the delegated responsibility given to them by the Chief Executive for the implementation of this policy across the Council owned and managed properties.
- 6.2.2 The Assistant Director for Asset Management & Programme Delivery shall ensure that sufficient funds and resources are available to enable an adequate management of water hygiene related works arising from the water hygiene risk assessments or from other competent water hygiene advice, such as external consultants and/or specialist contractors.
- 6.2.3 The Assistant Director for Asset Management & Programme Delivery shall provide the Chief Executive and the Senior Leadership Team with sufficient reassurances that water hygiene matters and the prevention of legionellosis are being adequately addressed within their respective Directorates and where these measures have been identified as not being in place, an Action Plan should be drawn up to address any shortcomings.

6.3 Property Compliance Team.

- 6.3.1 The Property Compliance Team shall be responsible for ensuring all structural building as well as mechanical and electrical inspections and testing, within the corporate properties and residential buildings have been effectively carried out and monitored for compliance, in line with the council's legal duties and responsibilities.
- 6.3.2 The Property Compliance Team shall ensure adequate management of contractors as well as the data compliance monitoring of all works carried out to address buildings and plant statutory testing and inspections relating to water hygiene and the prevention of legionellosis.
- 6.3.3 The Property Compliance Team shall ensure that all works carried out to address building structure compliance as well as mechanical & electrical compliance are adequately checked for quality assurance and standard requirements.
- 6.3.4 The Property Management Team, in cooperation with the Asset Management Team, shall ensure an adequate management of the contractor's delivering remedial works as part of the preventative planned maintenance as well as reactive repairs.
- 6.3.4 The Property Compliance Team shall ensure the measurement of the Council's building safety, for structure integrity as well as the Mechanical & Electrical

Compliance Performance, providing competent advice and solutions to support the London Borough of Hounslow's senior management in meeting its regulatory duties, as laid out by the relevant legislation.

6.4 Asset Management Team.

- 6.4.1 The Asset Management Team shall ensure that a register is in place to hold all relevant data information pertaining to the council's owned and managed properties, plants and equipment.
- 6.4.2 The Asset Management Team shall ensure all properties and plants data is being regularly checked, validated, and maintained for accuracy.
- 6.4.3 The Asset Management Team shall ensure that all data compliance collected during a handover from the Development Team are communicated to the Compliance Team for validation and recording.
- 6.4.4 The Asset Management Team shall take ownership of a risk register and discuss with the property Compliance Team all risk in areas of contract management, ensuring – where applicable - that property, plant and equipment compliance requirements for water hygiene risk assessments, inspections and testing are being delivered and any risk to property compliance, is being adequately managed.

6.5 Directors and Head of Services.

- 6.5.1 The Directors (including Assistant Directors) and Head of Services are responsible for communicating and the local implementation of this policy across their areas of responsibility.
- 6.5.2 The Directors (including Assistant Directors) and Head of Services shall ensure that they are familiar with relevant legislation which impacts the type of water hygiene related work carried out by their Directorate.
- 6.5.3 The Directors (including Assistant Directors) and Head of Services shall Appropriately establish a downward responsibility for the management of water hygiene through their management structure.
- 6.5.4 The Directors (including Assistant Directors) and Head of Services shall support and – where applicable- implement competent waters hygiene advice as received from the Council's Building Structure Compliance Manager, ensuring that colleagues under their control have received sufficient information, instruction and training to undertake work activities that does not impede the integrity of the properties.
- 6.5.5 The Directors (including Assistant Directors) and Head of Services shall also have a thorough knowledge with any relevant service level agreements (i.e. Council's own premises where services are provided by a third party) and which may impact either the water hygiene risk assessment process or any associated water hygiene and legionellosis prevention related works.

6.6 Managers.

- 6.6.1 Managers shall ensure that all colleagues should be inducted and instructed precisely and clearly (where applicable) of their day-to-day duties relating to water

hygiene. This process is also a pre-requisite for all new starters and should form part of a new starter's induction process.

- 6.6.2 As part of the induction process, managers shall ensure that all colleagues are made aware of this policy, as well as how and where to report water hygiene issues and concerns.
- 6.6.3 Any budgetary requirements for the purposes of water hygiene and legionellosis prevention works are reviewed and approved. Where budgets are declined, a written record must be generated and maintained, outlining the reason(s) for the budget refusal and names involved in this decision making.
- 6.6.4 Managers shall ensure that suitable arrangements are in place to enable access to premises and residential buildings and corporate properties for the purpose of undertaking water hygiene risk assessments and/or completing any identified water hygiene and legionellosis prevention relating works.

6.7 Employees.

- 6.7.1 London Borough of Hounslow employees must ensure that they are familiar with this policy and to comply with its content at all time, effectively.
- 6.7.2 All employees must liaise with their line managers to ensure they complete their mandatory Health and Safety induction training, which includes relevant information of water hygiene as well as any other water hygiene related training identified as a pre-requisite to carry out their day-to-day duties safely.
- 6.7.3 All employees are responsible for ensuring they report any issues relating to water hygiene and the prevention of legionellosis to the building managers and/or housing managers for corrective actions to be taken. Such issues may include and not be limited to, exposed water pipes, very hot water temperatures, water taps that had not been flushed when not in use for more than a week, water discoloration running from water tapes, water tanks with removed lids and any other acts of vandalism to the water systems.

6.8 Corporate Health and Safety Team.

- 6.8.1 The Corporate Health and Safety Team shall ensure the health, safety and wellbeing of employees, visitors and other relevant stakeholders that are occupying the Council's owned and managed buildings, in the event of outbreak of Legionella bacteria related diseases.
- 6.8.2 The Corporate Health and Safety Team shall provide adequate health and safety to include water hygiene advise to all employees and relevant stakeholders- this includes Hounslow community schools and where the London Borough of Hounslow is the employer and Landlord, with the aim to prevent the risk of accidents, incidents and near misses to their health, safety and wellbeing and also to prevent the risk of a legionella outbreak with the council premises.
- 6.8.3 The Corporate Health and Safety Team shall measure health, safety and wellbeing performance, for accidents, incidents and near misses to prevent reoccurrence.

6.9 Housing Management Team.

- 6.9.1 The Housing Management Team shall ensure that this policy is communicated, implemented and made readily accessible to all those that are affected by it, within the residential buildings.
- 6.9.2 The Housing Management Team shall ensure that all Housing Officers and Coordinators are provided with adequate information, instructions and training to support London Borough of Hounslow's management of water hygiene and the risk of legionellosis across its general need residential building and sheltered housing occupiers.
- 6.9.3 The Housing Management Team shall ensure that Housing Officers and Housing Coordinators work cooperatively with the Corporate Health and Safety for reporting all accidents, incidents, near a miss and ill health arising from water hygiene and legionella prevention, so that these can be investigated and/or reported to the regulators through the appropriate channels, as and when required to do so.
- 6.9.4 The Housing Management Team shall ensure that Housing Officers and Housing Coordinators work cooperatively with the Asset Management Team, Corporate Health and Safety Team and the Property Compliance Team, by communicating the information passed on to them to the Council's Housing tenants and reporting health, safety and property compliance concerns back to the Council.

7.0 Management Arrangements.

7.1 Risk management and Water Risk Assessments.

- 7.1.1 The Asset Management Team shall ensure that an up-to-date Property Risk Register is in place to record any risk arising from and/or in connection with water hygiene and legionella prevention. This should be regularly monitored and reviewed by the Property Compliance Team for effectiveness.
- 7.1.2 The Property Risk Register shall include the risk areas, the risk evaluation based on the impact versus Likelihood to determine the risk level (High, Medium, Low), as well as the control measures and lines of assurances in place to mitigate the risk to the service.
- 7.1.3 The Risk Register shall determine the areas of risk which require special attention to prevent the risk of non-compliance with statutory requirements.
- 7.1.4 The Responsible Person is required to ensure that water hygiene risk assessments are carried out thoroughly and comprehensively and that any water hygiene and legionella prevention risk identified as a result of such assessments, are adequately addressed and corrected in a timely manner.
- 7.1.5 In addition, the Responsible Person is required to keep records of all water hygiene risk assessments and make them available to the regulators, such as the HSE, the EHO and inspectors from the Environmental Agency.
- 7.1.6 Water Hygiene Assessments shall be reviewed on a rolling programme. However, an earlier assessment may be triggered by a significant change to the property structure, a real water hygiene related incident and/or recommended by the water hygiene risk assessor.

7.2 Written Scheme of Control.

- 7.2.1 Water hygiene risk assessment stipulates that a site-specific written scheme of control shall be established by the Risk Assessor to minimise the risk of legionella bacteria and ensuring a good water hygiene approach and practice is adhered to in all premises.
- 7.2.2 A Written Scheme of Control shall include (and not be limited to) the following information;
 - 7.2.2.1 A description of the correct and safe system operations.
 - 7.2.2.2 A detailed schematic of the hot and cold-water system.
 - 7.2.2.3 A Comprehensive list of precautionary measures taken, to prevent the risk of legionellosis.
 - 7.2.2.4 A list of water hygiene checks that need to take place to monitor the effectiveness of each building water systems. This list of necessary actions should be clearly outlined on the water logbook.
 - 7.2.2.5 A comprehensive list of remedial action required in the event of lack of effectiveness of this scheme and/or water system failure.
 - 7.2.2.6 A list of water testing and monitoring protocol required to ensure the system support the prevention of bacterial contamination (i.e., legionella bacteria, TVC or Total Viable Count, etc.)
 - 7.2.2.7 A list of control measures required in the event of a failure to maintain water temperatures in the water systems. These should be set out in the water risk assessment.
 - 7.2.2.8 A list of necessary measures required in buildings such as sheltered housing, i.e., the installation of Thermostatic Mixing Valves (TMVs).

7.3 Training Provision.

- 7.3.1 London Borough of Hounslow is committed to providing adequate Water Hygiene and Legionella Prevention related information, instructions and training to all employees with the responsibility to water hygiene such as weekly water tap flushing, monthly water temperature measuring, within the Council's owned and managed properties, including communal areas in residential buildings.
- 7.3.2 The Council's tenants, leaseholders and their visitors shall be provided with suitable water hygiene information to assist with the prevention of legionella in the water systems.
- 7.3.3 Specialised Water Hygiene Training shall be provided as part of the Corporate Health and Safety programme, in collaboration with the Property Compliance team to all those employees identified with specialised responsibilities to Water Hygiene. This in order to enable them to undertake their day-to-day duties safely and efficiently, within their areas of responsibility.

7.4 Policy Review.

- 7.4.1 This Water Hygiene Policy shall be reviewed every two years for adequacy and effectiveness, ensuring it remains in compliance with the legal requirements as well as with the organisational structure in place to support its implementation.
- 7.4.2 This Water Hygiene Policy shall be reviewed in the event of change in the legislation, and/or a major change that has occurred to London Borough of Hounslow's governance structure and/or a significant change in the Responsible Person's role and responsibilities.