



Water Hygiene Policy (Housing)

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1 Accessibility of Document

Our aim is to make our services easy to use and accessible for everyone

We will take steps to make any reasonable adjustments needed for you to contact us, access our policies, or any requests to provide responses in other formats.

Depending on the individual's needs, these might include:

- Using larger print, or a specific colour contrast
- Giving more time than usual to provide information or comments on a complaint
- Using the telephone rather than written communication
- Communicating with a person through their representative or advocate
- Arranging a single point of contact
- Having an 'easy read' version of the document

If you would like to contact us about reasonable adjustments or alternative formats, please email edi@dacorum.gov.uk or call us on **01442 228000**

If you prefer to write to us, send your letter to:

Equality, Diversity and Inclusion Team
Dacorum Borough Council
The Forum, Marlowes, Hemel Hempstead
Hertfordshire
HP1 1DN

You can find information on Advocacy support here:

<https://www.dacorum.gov.uk/home/do-it-online/contact-us/advocacy-support>

2 What is the goal of the policy?

The aims of the policy are to:

- Ensure our compliance with Health and Safety Guidance (HSG) 274 and L8 approved code of practice
- Prevent water contamination in our domestic properties (specifically from Legionnaires disease)
- Clarify the housing service approach to managing the risk of water contamination
- Ensure that effective checks are in place to prevent the outbreak of legionella in properties that we are the duty holder for

3 How does the policy comply with the law and other requirements?

Under health and safety law, DBC must consider the risks from legionella bacteria that may affect our staff, residents and other members of the public and take suitable precautions. The legislation listed below will be taken into consideration when implementing this policy:

- Landlord and Tenant Act 1985
- Housing Act 2004
- HSG 274 Legionnaires' disease Part 2: The control of legionella bacteria in hot and cold water systems and where necessary HSG 274 Part 1 and Part 3
- Legionnaires' disease, The control of legionella bacteria in water systems, L8 (Fourth edition) Published 2013
- Health and Safety at Work Act 1974
- The Management of Health and Safety at Work Regulations 1999
- The Control of Substances Hazardous to Health Regulations 2002
- Social Housing Regulation Act 2023 (Consumer Standards)

4 Supporting Policies or Procedures

This policy links to and should be read in conjunction with the following policies and strategies:

- Corporate Health & Safety Policy
- Corporate Legionella Management Plan
- DBC Tenancy Agreement
- DBC Tenants Handbook
- Legionella Risk Assessment Procedure
- Legionella Hazard Management Procedure
- Legionella Non-conforming Temperatures Procedure
- Hertfordshire and Bedfordshire Legionella Outbreak Plan

5 EDI Statement

The Council is committed to promoting equality of opportunity. The Council has procedures in place to ensure that all individuals are treated fairly and without unlawful discrimination.

6 Policy Statement

6.1 Introduction

Legionnaire's disease is a potentially fatal pneumonia caused by legionella bacteria that can contaminate water systems such as cooling towers and hot / cold water services.

Under health and safety law, Dacorum Borough Council (DBC) must consider the risks from legionella bacteria that may affect our staff, residents and other members of the public and take suitable precautions.

This policy covers properties owned and managed by the housing service and which DBC are the duty holder for (see appendix 1) and all properties that become empty homes.

6.2 Commitments

- We will identify, assess and monitor sources of legionella risk
- We will take action to prevent the contamination of our water systems
- We will carry out regular auditing to ensure that records are kept and checks are undertaken in an effective manner
- We will make building managers aware of legionella risk and ensure they are efficiently trained to prevent it
- We will deal with outbreaks of legionella appropriately and efficiently

6.3 Identifying and monitoring sources of risk

As a Housing Service, we will carry out a suitable, sufficient and up to date UKAS/LCA accredited risk assessment in all properties with a stored/shared water supply where we are the duty holder (see Appendix 1). Where we are the freeholder, it is made clear in the given lease who has responsibility as duty holder.

We will undertake regular audits to ensure appropriate records are maintained and checks are carried out as required to prevent legionella outbreak. Documents that we retain include;

- Schematic diagrams of water systems
- Risk assessments and results (including corrective actions)
- Monitoring records (who did the work and when)
- Training records

Legionella risk assessments will be reviewed every two years by a competent person, or when material changes to the building/water systems are made. Any amendments or reasoning for no amendments will be documented.

6.4 Prevention

If a risk of legionella outbreak is identified, this will be prevented or controlled appropriately. We employ a specialist contractor to effectively manage and avoid risk.

Through our procurement process and contract monitoring, we ensure that contractors are competent to carry out the works needed. As part of their contract with us, they are expected to comply with legislation and guidance as referred to in section 3. Details regarding the actions that our contractor should undertake are set out in Appendix 2.

The Compliance Team is responsible for ensuring that records are maintained, kept safe and are accessible for inspection. The Compliance Team will review risk assessments and implement planned preventative measures (PPMs) to be undertaken by a competent contractor. Any defects that are identified through PPMs are reported to the Compliance Team who manage the risk accordingly. Legionella and Bacteria E.coli water sampling will be taken in accordance to the latest guidelines and water sampling plan from the legionella risk assessment.

In addition, we will inform building managers (e.g. Supported Housing Officers) of any actions they need to carry out to ensure building compliance. Specific duties of the building manager are identified within each site-specific risk assessment. These duties include, but are not limited to, regular flushing of toilets and taps in communal areas/infrequently used outlets.

We ensure that building managers receive appropriate legionella awareness training annually to make sure that effective risk management takes place.

6.5 Outbreak

If an outbreak of legionella occurs, environmental health will be informed and they will enact the Hertfordshire and Bedfordshire Legionella Outbreak Plan.

As DBC is enforced by the Health & Safety Executive, they may also be involved in the investigating compliance with health and safety legislation. If anyone is alleged to be suffering from a legionella related illness, we will recommend that they contact their GP.

7 Roles and Responsibilities

Operational responsibility for DBC's Housing Service adherence to this policy lies with the Assistant Director for Housing. Overall accountability lies with the Chief Executive of Dacorum Borough Council, deputised by the Strategic Director, Housing and Property Services.

Responsibility for carrying out the programme of risk assessments, ensuring compliance with HSE guidance and maintaining up to date records falls to the Compliance Lead Officer. The Head of Safe Homes oversees and holds accountability for this.

In line with risk assessments and planned preventative maintenance relevant members of the Safe Homes Team and Supported Housing team will be made aware of their water hygiene responsibility.

All employees of DBC have a responsibility to health and safety.

8 Appendix

8.1 Appendix 1 Properties DBC owns/manages/is duty holder for

Address	Duty Holder	Responsible Person/Entity	Location of Records	Building Manager	Ref
Betty Patterson House Christopher Court Compass Point Cranford Douglas Gardens Dudley House Elizabeth House Emma Rothschild's Court Evelyn Sharp House Florence Longman House Gade Towers (tank inspection only) Gilbert Burnet House Hilltop (tank inspection only) Langley House Leys Road Laundry 2-4 Leys Road Longlands (tank inspection only) Mayflower Avenue Oak lawns Old House Road Park wood Drive Pheasant Close (tank inspection only) Phyliss Courtnage House Pond Close Pelham Court Rice Close Saturn Way Southernwood Close Two Beeches William Crook House Willow Edge The Elms 51 Woolmer Drive Rosebery Way St Peters Court Summer Court Kylna Court Cornmill Court	Dacorum Borough Council	Assistant Director – Property Services / Head of Safe Homes/ Lead Officer – Compliance	Electronically on shared computer system with contractor (Job Logic)	Supported Housing Officers where applicable	

8.2 Appendix 2 Checklist for hot and cold water systems

Unless contrary identified by the legionella risk assessment and agreed by DBC, the contractor should undertake the following as a minimum;

Service	Action to take	Frequency
Calorifiers	Inspect calorifier internally by removing the inspection hatch or using a boroscope and clean by draining the vessel. The frequency of inspection and cleaning should be subject to the findings and increased or decreased based on conditions recorded.	Annually, or as indicated by the rate of fouling
	Where there is no inspection hatch, purge any debris in the base of the calorifier to a suitable drain Collect the initial flush from the base of hot water heaters to inspect clarity, quantity of debris, and temperature.	Annually, but may be increased as indicated by the risk assessment or result of inspection findings.
	Check calorifier flow temperatures (thermostat settings should modulate as close to 60 °C as practicable without going below 60 °C) Check calorifier return temperatures (not below 50 °C).	Monthly
Hot water services	For non-circulating systems: take temperatures at sentinel points (nearest outlet, furthest outlet and long branches to outlets) to confirm they are at a minimum of 50 °C within one minute (55 °C in healthcare premises)	Monthly
	For circulating systems: take temperatures at return legs of principal loops (sentinel points) to confirm they are at a minimum of 50 °C (55 °C in healthcare premises). Temperature measurements may be taken on the surface of metallic pipework	Monthly
	For circulating systems: take temperatures at return legs of subordinate loops, temperature measurements can be taken on the surface of pipes, but where this is not practicable, the temperature of water from the last outlet on each loop may be measured and this should be greater than 50 °C within one minute of running (55 °C in healthcare premises). If the temperature rise is slow, it should be confirmed that the outlet is on a long leg and not that the flow and return has failed in that local area	Quarterly (ideally on a rolling monthly rota)
	All HWS systems: take temperatures at a representative selection of other points (intermediate outlets of single pipe systems and tertiary loops in circulating systems) to confirm they are at a minimum of 50 °C (55 °C in healthcare premises) to create a temperature profile of the whole system over a defined time period	Representative selection of other sentinel outlets considered on a rotational basis to ensure the whole system is reaching satisfactory temperatures for legionella control
POU water heaters (no greater than 15 litres)	Check water temperatures to confirm the heater operates at 50–60 °C (55 °C in healthcare premises) or check the installation has a high turnover	Monthly–six monthly, or as indicated by the risk assessment