

	HEALTH & SAFETY Providence Row Housing Association	Water Safety Policy VERSION: 2

Water Safety Policy

1. INTRODUCTION:

Providence Row Housing Association appointed specialist water consultants to assist in the development of a risk management process for the control of domestic water systems within the Association's property portfolio. The risk management process sets out minimum requirements for risk control measures depending on the extent and complexity of water services identified within each type of premises. The risk management process is designed to ensure that adequate resources are allocated in order to adequately control with the level of risk identified.

This document describes the process of risk management and minimum risk control measures for each type of premises and associated water systems in accordance with the Health & Safety Commissions Approved Code of Practice (ACoP) and Guidance: Legionnaires Disease: The Control of Legionella Bacteria in Water Systems, commonly known and referred to as L8.

2. POLICY STATEMENT FOR THE CONTROL OF LEGIONELLA BACTERIA IN WATER SYSTEMS:

It is the policy of Providence Row Housing Association to do all that is reasonably practicable to protect residents, employees, visitors and neighbours from health hazards arising from the use and distribution of water in all the Association's owned or leased properties. This is achieved by the implementation of a risk management procedure to ensure full compliance with all statutory requirements of current relevant legislation, standards, codes of practice and published guidance. The policy and guidance is reviewed and updated on an annual basis by the Assistant Director Resident Services in conjunction with their appointed contractor in order to take account of any changes in legislation or advances in risk control technology and industry practice.

Providence Row Housing Association undertakes to perform the following actions:

- Provide adequate training for Providence Row employees.
- Identify all water plant and systems which present a potential risk of exposure to Legionella Bacteria.

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- Arrange for Legionella Risk Assessments to be conducted of “at risk” water systems and to review these assessments at least every 2 years and when significant changes occur.
- Eliminate or reduce risks whenever possible by the procurement of plant, equipment and systems which have been designed to eliminate or control the risks of exposure to Legionella Bacteria.
- Establish and operate a written control scheme for controlling risks from Legionella Bacteria in each Providence Row operated scheme.
- Monitor compliance with the written scheme and review risks and the performance of the risk control measures, revising risk assessments and written control schemes as required.
- Maintain comprehensive records for each property.
- Employ only competent, adequately qualified and trained personnel and service providers.

The management of Providence Row Housing Association regards the attainment of the above is a mutual objective for management and all employees of Providence Row.

3. RESPONSIBILITIES:

The Chief Executive of Providence Row Housing Association has overall responsibility for ensuring that its legal obligations with respect to the control of legionella bacteria in building water systems.

The Assistant Director Resident Services shall be responsible for:

- Implementing regular Water Hygiene Risk Assessments on behalf of Providence Row Housing Association;
- Regularly reviewing Risk Assessment;
- Ensuring that the requirements and recommendations of the Risk Assessments are complied with.

The Maintenance Manager shall be responsible for:

- Ensuring that log books are on site and the action plans are completed and signed off.
- Periodically inspecting the Log Books to ensure the accuracy of information and that inspections are being carried out in accordance with the terms of the water hygiene contract.

Providence Row Housing Association has appointed water treatment specialists to provide the necessary competent advice on policy and procedural matters,

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and to prepare legionella risk assessments, written control schemes and site documentation for legionella management and control.

4. LEGIONELLA BACTERIA & LEGIONNAIRES DISEASE:

Legionella bacteria commonly occur in both natural (rivers, ponds, lakes, soil, mud and sediment) and artificial water systems within building (cooling towers, evaporative condensers, and domestic hot and cold water systems). Under certain conditions, temperatures within the range 20°C to 45°C and nutrients contained within sludge, scale, biofilm and corrosion deposits, legionella bacteria can rapidly multiply thus increasing the potential for exposure.

These conditions can develop in poorly maintained and operated cooling towers, evaporative condensers, showers, spray apparatus and hot and cold water systems, which are the sources of most reported cases of Legionnaires Disease. Legionella bacteria are usually associated with larger water systems, for example in factories, hospitals and hotels but the bacteria can also populate smaller water systems used in homes or residential accommodation. Further potential sources of legionella bacteria include spa and whirlpool baths, humidifiers, water features and fire suppression systems (sprinklers and hose reels).

Water systems and services at Providence Row Sites which are normally considered to present a potential risk of exposure to legionella bacteria are listed below in descending order of risk:

- Hot & cold water services with central stored hot & cold water feeding shower facilities.
- Hot & cold water services with central stored hot & cold water with no shower facilities.
- Hot & cold water services with local area stored hot & cold water feeding shower facilities.
- Hot & cold water services with local area stored hot & cold water with no shower facilities.

The above list is for guidance only and should not be taken as an exhaustive listing of water systems that present a risk of exposure to legionella bacteria.

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Legionnaires Disease is a potentially fatal form of pneumonia caused by the inhalation of legionella bacteria. The bacteria are 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. There is no evidence that Legionnaires Disease can be contracted from person to person or by drinking water contaminated by legionella bacteria.

Legionnaires Disease has the potential to affect anybody; however, persons more susceptible are normally in the age range of 40 and above, smokers, heavy drinkers, persons suffering from chronic respiratory or kidney disease and persons with impaired immune systems. Healthy persons are not immune from catching Legionnaires Disease. A large proportion of reported cases of Legionnaires Disease within the UK each year are those returning from foreign travel.

The identification of legionella bacteria within a water system is **NOT** an outbreak, this is **ONLY** the case when two or more persons have contracted the disease from the same source.

5. MINIMISING THE RISK FROM LEGIONELLA BACTERIA:

It is generally accepted that levels of legionella bacteria found in typical mains supply waters are very low (normally below the detectable limit) and do not pose a serious risk providing they are not allowed to proliferate. The survival and growth of legionella bacteria are governed by a number of factors which include:

- Water temperature.
- Water retention period.
- Accumulation of sludge, scale, deposits and corrosion by-products.
- Use of unsuitable materials.
- Low levels of disinfectants and other biocide treatments.

Legionella bacteria do not reproduce at temperature above 50°C and below 20°C. However with the temperature range of 20°C to 45°C legionella bacteria can proliferate rapidly, giving rise to large numbers of the bacteria, and increasing the likelihood of a high risk of exposure.

In closed or sealed water systems even if legionella bacteria are found to be present at very high concentrations, under normal operation the risk present is low. However, during cleaning or maintenance works where aerosols may be

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generated these same low risk systems could present an unacceptable level of exposure to operatives performing such work. In these circumstances, job specific risk assessments and method statements (RAMS) must be in place to cover such maintenance and / or cleaning procedures.

Experience has shown that while it can be difficult to completely eradicate legionella bacteria from building water systems, the risks can be reduced to an acceptable and manageable level by the adoption of a suitable programme of system design and risk management and control.

6. LEGAL REQUIREMENTS:

Legislation in the United Kingdom in relation to exposure to hazardous substances including biological agents such as legionella bacteria is contained within The Control of Substances Hazardous to Health (COSHH) regulations. Under the COSHH regulations the employer has a duty to ensure that health risks associated with hazardous substances including micro-organisms such as legionella bacteria are adequately controlled in the work-place by a process of risk assessment and management control.

Further legal requirements are described in the Health & Safety Commissions Approved Code of Practice (ACoP) and Guidance: Legionnaires Disease: The Control of Legionella Bacteria in Water Systems (L8) which came into effect on the 8th January 2001.

Although failure to comply with any provision of the Approved Code of Practice is not in itself an offence, failure may be taken by a court in criminal proceedings as proof that a person or organisation has contravened the legal requirement to which the provision relates. In such a case, however, it will be the person or organisation that has to satisfy the court that compliance with the requirements has been achieved in some other way. The ACoP sets out guidance to satisfy the relevant legislative requirements under COSHH, which include:

- Identification and assessment of risk.
- Prevention or minimising the risk from exposure to legionella bacteria.
- Management and the selection, training and competence of personnel.
- Record keeping.

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- Responsibilities for designers, manufacturers, importers, suppliers and installers.

As a result of the importance attached by the government to Legionnaires Disease and its control, legislation also exists on the registration of cooling towers and evaporative condensers. Under these regulations, any cooling towers or evaporative condensers situated in premises must be registered with the responsible local authority. These guidance documents **DO NOT** cover such systems.

7. MONITORING AND TESTING:

The extent of monitoring is determined through categorisation of premises and water systems together with the risk assessment process described within this document.

8. PREMISES CATEGORISATION:

Providence Row Housing Association has worked closely with their nominated water consultants to determine the correct policy and processes for use with the various water system types and sizes installed within its property portfolio. It is essential that the policy adopted is not a one size fits all approach as the risks associated with mains supplied water systems are negligible compared with that of large stored water systems, showers, etc. The control measures applied to such systems should be commensurate with the inherent higher risk of systems which require more extensive and frequent monitoring, rather than those which are fundamentally lower risk, due to their design and simplicity.

Providence Row has undertaken a review of the property and water system types operated throughout their property portfolio and has compiled a list of minimum monitoring requirements for legionella control in each of the different types of premises according to water system type which are broadly categorised C1 to C5 (C1 is the lowest risk). System categorisation is detailed as follows:

C1: Direct Mains Supplied Hot & Cold Water Systems With Simple Arrangements

(for example, hot & cold water systems supplied directly from the incoming mains supply, hot water generated locally using instantaneous or small capacity (less than 30 litres) point of use water heaters).

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C2: Direct Mains Supplied Hot & Cold Water Systems With More Extensive Arrangements (for example, hot & cold water systems supplied directly from the incoming mains supply with more extensive water distribution incorporating hot water generated locally or remotely using water heaters with a capacity of greater than 30 litres).

C3: Cold Water Storage & Hot Water Systems (for example, a cold water storage tank supplying either cold water service outlets or hot water heaters or both).

C4: C1 to C3 plus the incorporation of shower facilities fed from direct mains supplied point of use electric units.

C5: C3 plus the incorporation of shower facilities fed from central water systems.
The minimum monitoring requirements for the above categories of water system in various property types are detailed in Appendix 1.

The actual level of risk will be dependent on a number of factors including system design, operation, condition, maintenance and susceptibility of building occupants. It is important to establish the written control scheme and any requirements for remedial measures such as cleaning and disinfection, equipment removal or replacement.

9. IDENTIFICATION & ASSESSMENT OF THE RISK FROM LEGIONELLA BACTERIA:

Providence Row's nominated water consultants are responsible for completing the site survey, the risk assessment and for the preparation of a site specific written control scheme, record system and programme of maintenance and monitoring for each property.

In carrying out the initial assessment of potential risk of exposure to legionella bacteria, it is essential to take account of the main factors affecting that said risk, as detailed below:

- The potential for legionella bacteria to colonise, survive and proliferate in the water system under normal operating conditions, for example, is the water temperature between 20°C and 45°C or is there debris in the system such as rust deposits, sludge or scale.
- The potential for water to stagnate including over-capacity and dead leg area, for example, capped pipe work or vacant areas of the property no longer used.
- Infrequently used outlets such as showers, taps, etc.

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- The potential for aerosol generation during normal operation, and when maintenance work is undertaken.
- The potential for exposure of persons to aerosols containing viable legionella bacteria.

It is essential that all sites are assessed adequately to ensure that the most appropriate provisions are made to comply with current legislation. This must include the whole property, including tenanted areas that do not have separate water facilities, or supply from the local water supply company, or where Providence Row Housing Association are responsible for building water services.

The risk assessment shall be reviewed at least every 2 years or when changes occur. Where the system is unchanged, the existing documentation shall remain but the review date and signature of reviewer must be entered onto the review sheet contained within the risk assessment document. A completed copy of the risk assessment and written control scheme shall be located within the Water Management Log Book supplied by our nominated water consultants.

10. RISK CONTROL & WRITTEN CONTROL SCHEMES:

When deciding on control measures appropriate to deal with risk allocation, the following list should be considered in the order given:

- The elimination of the hazard at source, for example, a direct mains-supplied point of use system.
- The reduction of the hazard at source, for example, large water systems, spray apparatus and dead-legs.
- The reduction of the exposure to the hazard, for example, system checks, temperature monitoring and flushing of infrequently used outlets.

Process, control measures and policy, must be reviewed on a regular basis and revised as required. Similarly if conditions change to the extent that any risk identified is significantly affected then the risk evaluation and management process shall be reviewed.

Written control schemes must be provided for controlling the risks identified by the risk assessment taking into account the minimum monitoring requirements detailed in Appendix 1. The written control scheme shall clearly identify the

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specific actions required, their frequency and the organisation responsible for the undertaking of such actions.

In controlling the risk of exposure to legionella bacteria within “at risk” building water systems, particular attention must be paid to the following:

- The control and reduction of aerosol emissions.
- The control of legionella bacteria proliferation by the application of a suitable water management programme including cleaning and disinfection, temperature control and if required, water treatment, plant and equipment checks, and routine maintenance to ensure compliance with recommendations given in HSC L8 guidance.
- The monitoring of the performance of the water management programme.
- The effective communication, training and documentation for the operation and maintenance of the water system(s). Additional checks and auditing should also be undertaken to ensure the adequacy of preventative actions for controlling the associated risks.

11. TRAINING:

The personnel employed to carry out legionella risk assessments and implement written control measures must be adequately trained and competent to undertake such tasks. Organisations involved in such work should be registered members of The Legionella Control Association. Training will normally comprise of a programme of in-house training by the organisation concerned, combined with external accredited training by a recognised professional body. Copies of training records and a copy of the company training policy for staff employed in the control of legionella bacteria shall be incorporated within the site log book at each location.

Providence Row Housing Association's personnel and those persons involved in the management and implementation of the risk control programme must also be trained and competent in the duties they are required to undertake. Providence Row Housing Association's nominated water consultants will provide

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specific training in legionella Awareness and Management, together with the risk management process detailed in this document. Providence Row will also provide support to scheme managers and employees in order to ensure that they understand the risk management process and their role in its successful implementation.

12. WATER MANAGEMENT PROGRAMME:

The risk assessment programme is due to be implemented from January 2013 onwards. On the completion of each risk assessment a written control scheme and site record system including log book will be prepared. Any serious non compliance identified during the survey visits will be communicated to the Maintenance Manager and a suitable course of action will be agreed.

It is intended that routine system monitoring of temperature and flushing will be carried out using local resources. Where more specialised services are required, such as cleaning and disinfection these will be procured by Providence Row Housing Association in association with our nominated water consultants.

Future water quality monitoring requirements will be co-ordinated by the Maintenance Manager and our nominated water consultants. Risk assessments will be reviewed every 2 years or more frequently if changes occur to building water services and / or occupancy in accordance with HSC L8 guidance.

13. DOCUMENTATION & RECORDS:

The HSC Approved Code of Practice and guidance requires that detailed records are to be kept. It is essential that records are organised in a structured format and reflect the key management processes in order to demonstrate compliance with the relevant statutory requirements and Providence Row Housing Association requirements as set out in this document.

Relevant information shall be compiled and maintained by the Scheme managers to ensure that procedures and records reflect the water systems identified in the risk evaluation process. The Assistant Director Property Services will assign the tasks set out in the annual planned preventative maintenance

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(PPM) schedule to ensure that operatives comply with the risk management programme.

It is the duty of Providence Row Housing Association, and its employees and agents to ensure that organisations and personnel employed are competent, suitably trained and have the necessary equipment to undertake their duties under the written control scheme, adequately and safely. These arrangements will be audited at a nominated percentage of sites on a randomly selected basis. Any non-compliance will be formally reported, and dependant on the severity, may include a written warning notification.

The level of documentation provided will be dependent on the system category determined for each location following the format of the following list:

Site Information

- Risk Management Process.
- Risk Assessment Report and Survey Forms.
- Schematic drawing(s).
- Written Control Scheme & PPM Schedule.
- Training Records.
- Chemical Safety Information (If Water Treatment Chemical Are In Use).

Diary

- Diary Pages for Recording ALL Site Checks, Maintenance & Monitoring.

Temperature Monitoring

- Category 1: Quarterly Depending On Risk Assessment.
- Category 2 to 5: Monthly Depending On Risk Assessment.

Cleaning & Disinfection Certificates

- Only approved Documentation to be use In Order to Ensure Consistency in Site Documentation.

Water Treatment

- ALL water treatment chemicals and equipment should be used in accordance with the manufacturer's instructions. Chemicals should be

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dosed to achieve stated concentrations and amounts of chemical used, recorded.

ALL RECORDS SHOULD BE KEPT FOR A MINIMUM OF FIVE YEARS

14. MAINTENANCE

Cold Water Storage Tanks:

Cold water storage tanks should be inspected on at least an annual basis. As they can be the potential weak point in a system particular attention should be given to:

- Are overflows, warning pipes and vents fitted with insect / vermin protection?
- Insulation.
- Correctly fitted lid, constructed of a suitable material.
- Operating temperature below 20°C.
- The internal condition is clean and clear of detritus, signs of stagnation, scale accumulation and corrosion deposits.
- Where issues are identified that are easily rectified, these should be implemented as soon as practicable. Drain, clean, paint or fit liner and disinfect before being returned to service.
- If the tank is in poor condition and requires replacement then consideration should be given into replacement with a directly mains fed supply.
- All checks and maintenance must be documented.

In certain properties drinking water may be supplied from a cold water storage tank. If this is the case then the tank **MUST** be inspected on a six monthly basis.

Drinking water (potable) standards should be maintained at all hot & cold including shower and spray outlets.

Water Heaters & Calorifiers:

Several water heaters (point of use, split tank heaters etc.) will not be possible to inspect internally, however, where possible an internal inspection should be completed on an annual basis. All activity should be recorded, and it is

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recommended that before & after photographic records are taken. Particular attention should be given to the following:

- Ensure water heaters with internal make up tanks are cleaned of scale, biological fouling, sediment etc.
- Check water temperatures. Calorifiers must store hot water at 60°C, and return at greater than 50°C. Water heaters must achieve an outlet temperature of between 50- 55°C.
- Calorifiers must be free of scale, corrosion, biological fouling and sludge. If found they must be removed by chemical / physical cleaning. All corrosion must be controlled.
- Pasteurisation of Calorifiers (water heated to 70°C) must be undertaken on at least an annual basis and to control microbiological fouling.
- Monitor system water temperatures.
- All checks and maintenance must be documented.

Shower Installations:

Showers and spray apparatus, like other water systems, are subject to fouling by scale, corrosion and colonisation by microbiological organisms. The typical shower installation is most at risk from the shower head as large amounts of aerosol are generated when the shower is in use. The quality of water from the system will depend on the frequency of use, location and operating temperatures.

De-scale intervals for the shower heads will depend on the usage and the hardness of the supply water. In sheltered schemes, the following actions will be undertaken by the appointed person responsible for that scheme, who will also have the responsibility for periodic monitoring, and recording the results.

ALL SHOWERS IN SCHEMES MUST BE DESCALED AND CLEANED ON AT LEAST A QUARTERLY BASIS. Although electric point of use showers present a lower inherent risk they must still have the same cleaning and descaling regime. Particular attention should be given to the following:

- Where practical, the hot water temperature should exceed 50°C when flushing. In situations where thermostatic mixing valves are fitted the maximum achievable temperature may be limited to 45°C.
- Showers heads spray apparatus and flexible hose fittings should be cleaned and descaled at least on a quarterly basis.
- Monitor shower operating temperatures on a quarterly basis.
- All checks and maintenance must be documented.

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Design Philosophy for Upgrading and Provision of New Installations:

Water services that are directly fed from the incoming mains supply present reduced risk to building occupants, so when contemplating new or refurbishment projects that involve work to the water services; this shall be the preferred solution. In all other circumstances, systems shall be changed from stored, to mains-supplied, as opportunities arise for an upgrade.

When completing upgrade work, water services must comply with British Standards and Water Supply regulations. Any changes made to site water systems must be documented within the site record system and where appropriate, the risk assessment and schematic drawings must be amended accordingly.

The key points to consider when refurbishing or installing new water systems are:

- Keep systems simple.
- Restrict microbiological growth by keeping temperatures below 20°C.
- Remove disused systems and dead legs.
- Use low capacity local area water heaters.
- Insulate pipe work.
- Run all systems from the direct mains supply.
- Where showers are required, use electric point of use units.
- Label all outlets including drinking water.
- Document all installations on a schematic drawing

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