

Water Safety Policy

Our Vision

Building better lives through social care and housing in local communities.

Our Mission

We co-design and deliver services that offer innovative social care solutions and support people to thrive.

Our Values



Cally Yard
439 Caledonian Road
London N7 9BG
T: 0333 010 4600

lookahead.org.uk



Look Ahead
CARE, SUPPORT AND HOUSING

1. Introduction

- 1.1 This policy sets out our approach to water safety and how we will meet our responsibilities and duties, as a landlord, for the management and control of Legionella in Water Systems in properties.
- 1.2 This policy applies to:
- Unsupported, rented properties
 - Supported housing
 - Market rented properties
 - Temporary accommodation
 - Stock owned, but not managed by Look Ahead
 - Communal areas
 - Commercial properties (offices, depots and shops etc)
 - Stock managed by us on behalf of a third party
 - Curtilage
- 1.3 Legionella bacteria can cause Legionnaires' Disease - a potentially fatal form of pneumonia and everyone is susceptible to infection. For Legionnaires' Disease to develop, the Legionella bacteria (specifically Legionella pneumophila) is water borne and is usually transferred by inhalation of water droplets. Under normal conditions the disease cannot be passed from one person to another.
- 1.4 This policy aims to:
- Ensure as far as reasonably practicable that customers, employees and visitors to our properties are not exposed to any risks to their health, safety or wellbeing in accordance with legislative requirements.
 - Provide clear lines of responsibility across the organisation for the management of water safety.
 - Specify individual responsibilities for the management of water safety.
 - Clarify our approach to inspection and the management for water safety.
 - Clarify the method for reviewing and monitoring the compliance with relevant legislation and statutory duties relating to water safety.

2. Definitions

- 2.1 The term 'customer' refers to our tenants, leaseholders and licensees as well as members of their household.
- 2.2 The Statutory Duty Holder is Executive Director of Asset & Property.
- 2.3 An 'operative' is a competent person qualified to undertake water safety work to the required standard.

3. Policy Statement

- 3.1 We accept our responsibilities under the Health and Safety at Work *etc.* Act 1974 and the Control of Substances Hazardous to Health Regulations 2002 (COSHH) to take all reasonable precautions to ensure the water storage systems within our control are safe and to prevent or control the harmful effects of contaminated water (ie Legionella) to customers, employees and other persons working at or using our premises.
- 3.2 We are committed to meeting our obligations as a Responsible Person under all relevant legislation and statutory guidance, to provide safe homes for our residents, safe workplaces for our employees and ensures safety for visitors.

4. Our Commitments

- 4.1 We will ensure, as far as reasonably practicable, that the operation of our properties does not expose people to risks to their health or safety in relation to water. We will carry out our individual and collective duties by:
- Identifying and assessing sources of risk.
 - Understanding and complying with all relevant legislation including the requirements of COSHH.
 - Complying with the requirements of L8: Legionnaires' Disease, The Control. Of legionella bacteria in water systems.
 - Undertaking legionella risk assessments for all properties, offices and blocks with shared water supplies at least every two years and more frequently where the risk assessment suggests it and deliver monitoring and management programmes as required.
 - The provision of suitable, sufficient and risk appropriate precautions to prevent or minimise the risk of exposure to Legionella.
 - Keep records of the precautions implemented for each of the premises within our control.
 - Engaging openly and proactively with our regulators and other stakeholders.
 - Carrying out remediation and monitoring actions as identified within the appropriate timescales.
 - Use competent and contractors and monitor the performance of these contractors on an ongoing, regular basis.
 - Inspecting/checking water infrastructure at change of occupancy.
 - Maintaining accurate asset records and data.
 - Our staff will be competent commensurate with the activities they undertake.
 - Seek independent assurance and challenge our performance.
 - Report on our performance including internal checks and audits to the Board.

- 4.2 Full details of our management plan for ensuring safety from Legionella is provided in our Legionella Procedure, including the process to be followed in the event of a legionella outbreak or positive legionella test result.
- 4.3 A detailed list of legal requirements and guidance is detailed below.

5. Owned, Leased and Managed Properties

- 5.1 Where we own and manage properties, we remain the Responsible Person in relation to water safety and, as such, we accept our legal duty to risk assess these properties and complete any works within our control.
- 5.2 Where we own properties which are not managed by us, we remain the Responsible Person in relation to water safety and, as such, we accept our legal duty to risk assess these properties and complete any works within our control. The exception to this is where the lease explicitly specifies otherwise, in which case the managing agent will be the Responsible Person. Where we are not specifically designated as the Responsible Person for a property we will seek assurance from the Responsible Person that the property meets all legislative requirements regarding the management of water safety.
- 5.3 Where we manage properties that are not owned by us the Responsible Person will be set out in the Management Agreement. Where we are not specifically designated as the Responsible Person for a property, we will seek assurance from the Responsible Person that the property meets all legislative requirements regarding the management of water safety.
- 5.4 Where we own a property on a full repairing lease, we will be the Responsible Person unless otherwise specified in the lease. The Lessee will retain responsibility for maintenance and safety under the terms of the lease and is legally responsible for water safety in relation to all matters under their control. Where we are not the Responsible Person, we will seek assurance from the Responsible Person that all legislative requirements are being met regarding the management of water safety.
- 5.5 Where we seek assurance from the Responsible Person and do not receive an adequate response, we will take reasonable further steps to follow this up, commensurate with the level of risk to its residents. These further steps may include:
 - Further follow-up correspondence seeking the involvement of enforcing authorities, such as the local authority or Health and Safety Executive to establish the position and compel a full and adequate response from the Responsible Person.
 - Explore possible legal action/proceedings to compel a response.
 - Give consideration, on an exceptional, one-off basis (and by doing so in no way accepting future responsibility/liability from the Managing Agent for the involved Water Safety activity/requirement) to completing the activity/requirement involved in the over-riding Health and Safety interests of our customers – in such circumstances the costs of

completing such an activity/requirement will be recharged to the Managing Agent via their Responsible Person.

- Records will be kept for the current and previous year in relation to all responses received from Managing Agents and their Responsible Person's.
- It is the responsibility of the Service/Contract Manager to request copies of certificates from the relevant landlord.

6. Roles and Responsibilities

- 6.1 The Chief Executive retains the overall responsibility for the implementation of this policy.
- 6.2 The Senior Health & Safety Manager will ensure that all health and safety requirements are met, and that this policy is updated to reflect any new and/or emerging legislation and regulatory requirements and will ensure compliance with the policy in our services.
- 6.3 The Executive Director of Asset and Property is responsible to ensure this policy is implemented and they will provide adequate resources to implement this policy. They will ensure that there are effective processes in place to implement this policy in relation to the function of asset management, repairs and maintenance where we are responsible.
- 6.4 The Head of Compliance and Building Safety is the Responsible Person where we are responsible and will ensure this policy and associated procedures are adhered to by staff and contractors. They are responsible for keeping this policy up to date.
- 6.5 The Gas and Water Safety Manager is responsible for the operational delivery of all Water Related Programmes and Remedial Works where we are the Responsible Person.
- 6.6 The Compliance Contracts Manager will seek assurances where we own properties where we are not the Responsible Person that all legislative requirements are being met regarding the management of water safety.
- 6.7 The Director of Housing and Customer Experience is the Responsible Person where we manage properties where we are not the Responsible Person and will seek assurance from the Responsible Person that all legislative requirements are being met regarding the management of water safety.
- 6.8 All members of staff are responsible to immediately report repairs and concerns to water systems and associated equipment as part of their routine duties and visits to our buildings and customers' homes. Training will be provided, as appropriate, to improve safety awareness across the organisation in accordance with our Training Matrix.
- 6.9 Under the terms of their occupancy agreement, licence or lease, residents are required to immediately report any concerns, allow access to service and maintain the water systems and associated equipment.

- 6.10 Contractors and subcontractors must comply with the arrangements of this policy and demonstrate competency in the management of their work activities in relation to water safety.
- 6.11 A competent member of staff or appointed competent contractor will provide advice and guidance on the appropriate methods of risk assessment and control measures arising and the management of works, as appropriate, relating to water safety.
- 6.12 There are numerous operational roles with responsibility for property and tenancy management whose titles vary. These teams support customer liaison and manage the response or completion as appropriate of water inspections and repair relevant to the management of our properties or tenancies. This includes managing issues relating to access, ASB and repair resolution.

7. Measuring compliance

- 7.1 Performance reports in relation to water safety will be reviewed as follows:
- Weekly Compliance Team Meetings
 - Monthly Compliance Meetings
 - Monthly by the Senior Management Team
 - 3 Monthly by the Audit and Risk Committee
 - 6 Monthly by the Board
- 7.2 These reports are in accordance with approved Key Performance Indicators (KPIs) which shall include:
- The Water Risk Assessment Programme.
 - Completion of Water Risk Assessment identified remediation action outstanding against an action plan for completion.
 - Completion of Water Risk Assessment identified remediation action that are overdue against an action plan for completion.
 - Completion of monthly monitoring programme.

Record Keeping and Confidentiality

We will comply with our Data Protection and Confidentiality Policy which can be found by clicking [Here](#) or visiting our website at www.lookahead.org.uk.

Copies of risk assessments and record of routine maintenance will be held in an easily accessible location and made know to all relevant parties. The Responsible Person will ensure that a copy of these files is held centrally and contain:

- all relevant water system drawings in schematic format
- details of water systems that are in use
- all risk assessments
- all action plans
- control systems
- monitoring documents

All records/documents will be retained for a minimum of 2 years or in line with our Archive, Retention and Disposal Policy.

Inclusion and Diversity

We aim to:

- meet the needs and choices of all individuals and to make reasonable adjustments to meet the needs of individuals
- ensure that our services are relevant, responsive and sensitive to the needs of our existing and future customers
- ensure that all our customers have equal access to our services and the information they need to manage their homes and meet their responsibilities with regard to water safety
- treat our everyone that we work with fairness and respect and in line with Look Ahead's vision and values

Policy Sign Off and Ownership	
Document Name	121.00_Water-Safety
Version	4.0
Equality Impact Assessment	N/A
Who was consulted?	N/A. This policy sets out our legal and regulatory duties to maintain the health, safety and well-being of everyone visiting our properties and it is not open to consultation.
Approved By/Date	Policy Group, 17 April 2025 – Amendments signed off by the Chair on 25.4.25
Date for Review	April 2028
Author	Head of Compliance & Building Safety
Owner (if different)	Executive Director of Asset & Property
Document Location	SharePoint
Compliance Measures	See policy
Related Policies/Procedures	Archive, Retention and Disposal Policy Repairs Policy
Relevant Legislation and Regulatory Requirements	• Landlord & Tenant Act 1985 • Health & Safety at Work Act 1974 • Management of Health & Safety at Work Regulations

	1999 • Workplace (Health, Safety & Welfare) Regulations 1992 (as amended) • Control of Substances Hazardous to Health Regulations 2002 (COSHH) • Defective Premises Action 1972 • Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) • The Water Supply (Water Fittings) Regulations 1999 • The HSE's Approved Code of Practice and Guidance L8 "Legionnaires' Disease: The control of legionella bacteria in water systems" • Building Regulations 2000 (as amended) • Building Regulations Part G, Sanitation, Hot Water & Water Efficiency • Building Regulations 2010
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Version History			
Version	Date	Description of Changes	Author
3.0	18.05.2022	Programmed update and refresh	██████████
3.1	08.11.2022	Added a definition of legionnaires disease and what to do in case of a legionella outbreak in line with audit recommendations	██████████
4.0	11.04.2025	Review and refresh, updating roles and current structure. Updated KPI's to include monitoring activities.	██████████ and ██████ ██████████