

Bromford Flagship

Water Safety Policy

Policy Statement & Purpose

The purpose of this policy is to demonstrate Bromford Flagship's commitment to ensuring the risk to people, buildings and the wider business are reduced as far as reasonably practicable while ensuring that all legislative requirements are met.

Our policies are supported by other documents including detailed procedures and processes to ensure that the policies are fully embedded into routine working practice.

Bromford Flagship will ensure all water systems (shared or individual) are risk assessed, kept safe for use and, if required, be regularly maintained. In doing so Bromford Flagship are fully committed to meeting all applicable statutory & regulatory requirements, including best practice standards in water safety/hygiene management, ensuring continual improvement in compliance performance and adopting a risk averse approach for any non-approved deviation from this Policy. *Our *Board, as duty holder will receive assurance of statutory, legislative, and regulatory compliance at regular intervals for their review and scrutiny.

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1. Scope

This Policy covers Bromford Flagship Limited and its subsidiaries [excluding Gasway].

The scope of this Policy includes Legionella Management and Scalding Prevention.

1.1 The Water Safety Policy and associated procedures detail how Bromford Flagship meets the requirements of the HSE's Control of Legionella in Water Systems: Approved Code of Practice L8. In addition to this, the policy provides assurance to Bromford Flagship that measures are in place to identify, manage and/or mitigate risks associated with water safety. As part of the policy Bromford Flagship will ensure compliance with water safety legislation and guidance and formally report at Executive and Board level, the details of any significant non-compliance and unmanaged breaches and risks, along with any planned corrective actions.

1.2 The policy is relevant to all Bromford Flagship colleagues, customers, contractors and other persons or stakeholders who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services. It should be used by all to ensure they understand the

**References to "the Board" in this document and our governance arrangements mean the coterminous Board acting as the Boards of Bromford Flagship Limited (BFL), Bromford Housing Association Limited (BHA), Flagship Housing Limited (FHL), Merlin Housing Society Limited (MHS) and Bromford Home Ownership Limited (BHO).*

obligations placed upon Bromford Flagship to maintain a safe environment for customers and colleagues within our buildings.

1.3 Bromford Flagship will follow a systematic approach to the management of water safety to ensure it meets the requirements set out in the Code of Practice and other relevant legislation relating to water safety. This is to ensure the safety of customers, leaseholders, colleagues and members of the public.

1.4 This policy applies to all Bromford Flagship domestic properties, communal areas, commercial properties, offices and buildings under its control or occupation. It also applies to any of our housing blocks and support schemes where the building is under our management. Where the building is controlled or managed by a third party then the responsibility for water safety in their designated areas must be agreed, formally documented and subsequently monitored, with the management company or commercial tenant unless this is otherwise stated in the management contract.

2. Legislative Requirements

The application of this policy will ensure compliance with the Safety and Quality Standard (consumer standards) April 2024.

2.1 Legislation

The principal legislation applicable to this policy are as follows:

- The Water Supply (Water Quality) Regulations 2018
- Health & Safety at Work, etc. Act 1974
- Landlord and Tenant Act 1985 (as amended)
- The Housing Act 2004 (England and Wales)
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- HSG 274 Legionnaires' Disease
- Parts 2 and 3 - Safe water in healthcare premises (HTM 04-01)
- Control of Substances Hazardous to Health Regulations 2002 (COSHH)

2.2 Codes of Practice & British Standard

The principal Code of Practice and British Standard applicable to this policy are:

- Legionella Bacteria in Water Systems Technical Guidance (HSG 274) and Approve Code of Practice L8

3. Responsibilities/Duty Holder

Role	Responsibilities	Frequency
Board	<ul style="list-style-type: none"> • They are the responsible legal entity and must oversee the discharge of the required standards. • They act as Duty Holders and are accountable for ensuring the implementation of this Policy and the associated Management Plans • They will receive assurance through regular performance reports that the Policy and Management Plan are being implemented and that the regulations are being fully complied with. • In doing so they will ensure the safety of colleagues, customers, contractors, and the wider public has not been compromised. • They will also ensure that appropriate governance arrangements are in place to keep internal stakeholders, and other interested third parties, 	6 Monthly/ Annually

	<p>informed of the regulatory landlord compliance position.</p> <ul style="list-style-type: none"> • The Board will be responsible for ensuring that any necessary remedial action, arising from performance reports, are undertaken to comply with the Policy and ensure that a regulatory landlord compliant position is maintained. • Will receive reports and commentary on Water Safety compliance performance at each meeting. 	
Audit and Risk Committee	<ul style="list-style-type: none"> • Seek assurance that the regulations are being adhered to providing challenge on the adequacy of controls • # Approve this document and notifying board of key changes to this document • # They will receive Internal Audit reports, and monitor the delivery of actions arising, through to successful completion. • # They will draw any concerns they may have arising from such reports to the attention of the Board • Provide critical friend support and advice 	Quarterly
Chief Executive Officer	<ul style="list-style-type: none"> • Retains the overall responsibility for the monitoring of the consistent implementation of this Policy and associated Management Plans to effectively comply with the regulatory standards. • If the regulatory standards are not maintained to report any breach in standards to the Board and Regulator of Social Housing. 	Ongoing
Disclosure Committee	<ul style="list-style-type: none"> • Provides oversight on the adequacy of assurance over regulatory requirements • Reviews external reporting prior to submission / publication • Delegates operational oversight to appropriate persons or groups as required to fulfil the above remit 	Regularly
Chief officers	<ul style="list-style-type: none"> • Appoint/nominate sufficient resources to fulfil the Responsible Person roles for all Water Safety requirements and use this Policy to define their duties. • Delegate appropriate authority for in-house delivery or procurement to meet the requirements. • Ensure that the conditions of all contracts are being fulfilled either by Internal Service Provider/s or external Contractors. • Will oversee the programme of Policy and Strategic Review • Inspiring a culture which ensures compliance is prioritised and colleagues are trusted and encouraged to report concerns of non-compliance. 	Ongoing
Senior leaders	<ul style="list-style-type: none"> • Agree and set budgets that are sufficient to meet the compliance requirements • Will ensure the operational delivery of this Policy and Management Plans and compliance with the regulations • Will manage the strategic implementation of this Policy and ensure compliance with all Regulations. 	Ongoing

	<ul style="list-style-type: none"> • Receive feedback from Third Party External Validation Consultants and liaise with Contract Managers and Contractors (Internal and/or external) to address any delivery shortfalls. • Monitor the quality and correct storage of all certification and documents required to demonstrate Landlord Compliance. • Will provide an effective performance management framework that will strengthen risk control and provide greater levels of assurance. • Will implement Data Governance Protocols • Will receive audit feedback and act upon the findings. 	
Delivery Teams	<ul style="list-style-type: none"> • Will formulate Programmes of Work consistent with the delivery of this Policy. • Will instruct/liaise with internal operational managers and external Contractors in respect to the operational delivery of this Policy and Management Plan. • Will liaise with Neighbourhood Management Team /Housing Team and customers to explain the importance of compliance and the need to achieve access to complete safety checks and works • Managing customer feedback (enquiries, complaints and compliments) handling and progress. • Liaise with IT and ensure system(s) and interfaces operate effectively • Will manage the availability of accurate Landlord Compliance Data sub-sets against which to prepare Work Programmes and Contracts. • Will oversee the preparation of the KPI/MPI and OPI reporting suite 	Ongoing
Colleagues	<ul style="list-style-type: none"> • Carrying out their work in line with this policy and associated procedures and processes • Applying Bromford Flagships DNA in everything they do • Reporting non-compliance to line management as soon as practically possible • Consider water safety in all our activities and notifying compliance leads of any activity which puts compliance at risk. 	Ongoing
Customers	<ul style="list-style-type: none"> • Agreeing to and keeping appointments to provide access. • Liaising with Bromford Flagship colleagues in relation to any poor service, failure to attend/poor repair etc. • Report any faults or defects impacting the safe water supply in their home. • Take note of Water Safety advice provided and follow the appropriate procedures in respect to seeking authorisation for any alteration work. • Provide customer satisfaction information. 	As required
Contractors/Suppliers	<ul style="list-style-type: none"> • Operational delivery of Water Safety Inspections to Non-Domestic and Domestic Stock. • Development of Water Safety Maintenance Programmes arising from the Risk Assessments. 	Ongoing

	<ul style="list-style-type: none"> • Review Property addresses and reconcile with databases to ensure the programme remains accurate. • Liaise with customers in relation to arranging/keeping appointments. • Liaise with the delivery teams in relation to access issues. • Update system(s) with accurate data in line with Data Protocols. • Provide appropriate, complete and correct certification for all Water Safety works. • Provide Quality Assurance (QA) checks in accordance with the contract. 	
Independent External Auditor	<ul style="list-style-type: none"> • Undertake External Validation of Electrical Safety Inspections in line with the Management Plan. 	Ongoing
Internal Audit and assurance	<ul style="list-style-type: none"> • Conduct reviews according to audit and assurance plans as agreed with ARC 	Ongoing

*** Note*** – Responsibilities mark with a # will potentially move into a dedicated group once the merger has taken place.

4. Principles

Bromford Flagship will comply with statutory, legislative and regulatory standards and are committed to providing a robust, safe, efficient and cost-effective service to our customers in relation to the management of water safety. In respect of our responsibilities for water safety Bromford Flagship will:

- Provide clear lines of responsibility for the management of Water Safety supported by written guidance in the Water Safety Management Plan.
- Retain an averse risk appetite in matters relating to water safety.
- Ensure that a clear and consistent process including front-line engagement and enforcement is in place to obtain access to properties to undertake Water Safety Checks, which shall include legal action when required.
- Ensure every contractor or consultant employed by Bromford Flagship to carry out works in our homes and buildings has the relevant licenses, registrations, accreditations, competencies and qualifications, as specified by the relevant regulations and Bromford Flagships procedures.
- Ensure colleagues receive appropriate training and is competent to fulfil their duties in relation to managing water safety.
- Ensure effective capture, monitoring and delivery of responsive repairs. Any reported defects, via the responsive repairs workstream, will be scheduled and executed within an appropriate timeframe in relation to the level of risk.
- Fulfil our commitment to equality and diversity while delivering services to our customers.

4.1 Water Systems

- Regularly review existing properties and assess risk within new stock through a desktop review, which will identify those properties at potential High Risk of Legionella.
- All properties with Communal Stored Water Systems, and where a potential risk has been identified at desktop review, will have a Legionella Risk Assessment (LRA) undertaken.
- All other properties identified through the desktop review of potentially High Risk will be subject to an LRA to determine if further management is required.

- The review period for future Risk Assessments will be established through a risk-based approach within the initial Risk Assessment carried out by the Competent Person.
- A Water Safety Management and Monitoring Programme will be established as required from the LRA findings.

4.2 Voids

- Water systems to Void Properties will be subject to a drain down to avoid potential contamination/bacterial growth. Alternatively suitable flushing regimes will be implemented.
- Shower heads will be replaced as part of the Void Management Process.

4.3 Scalding

- Implement measures to reduce the risk of Scalding by installing Thermostatic Mixer Valves (TMVs) to High-Risk properties, as detailed within the Water Safety Management Plan or Water Safety Procedure.

4.4 Unadopted Systems

- Remove lead pipework that may still exist within the housing stock, as Bromford Flagship is made aware.
- Maintain un-adopted Water Systems to the required standards as defined within the Water Safety Management Plan.

4.5 Data

- Maintain an up-to-date Master Database of all properties where Flagship Housing Group has a responsibility to provide Water Safety Checks and maintenance.
- For each relevant property record and maintain up to date data confirming which of the systems and appliances within the scope of this Policy exist and do not exist and the organisation's associated responsibility.
- Hold Water Safety Maintenance Records electronically in the Master Database, by the relevant Operational Department (to be specifically identified in the Water Safety Management Plan), with other Landlord Compliance records. There may be instances where a hard copy is kept on site and these will be detailed again in the Management Plan.
- Where a requirement exists hold data and certification relating to the last two Safety Checks and record the next due date.
- Where a requirement does not exist hold appropriate evidence.

4.6 Access

- Have a robust process in place to gain access to homes and property for undertaking essential electrical safety inspection and works, in accordance with Bromford Flagships access procedures.
- Take appropriate legal action where customer refuse or fail to facilitate access to their home to undertake a test and inspection.

5. Linked documentations (including policies, procedures, standards, processes, reconciliation frameworks)

Bromford Flagship Documents	Bromford only	Flagship only
Bromford Flagship Health and Safety Policy	Water Safety Procedure	Water Safety Management Plan
	Waste Water Treatment Policy	The Water Safety Operational Guidance Notes.

6. External References

External references

Health & Safety Exec <https://www.hse.gov.uk/pubns/books/l8.htm>

The Water Supply (Water Quality) Regulations 2018

7. Competence and Training

We will commit to demonstrating a sufficient level of skill, knowledge and aptitude that shows we can provide good quality advice and services to our customers. Competence will be detailed through our process and procedure documentation and remain under continuous review to ensure we provide our services safely and by suitably trained colleagues.

8. Assurance Framework

Our risk appetite is averse for health and safety risks. We have zero tolerance for actions or omissions that could compromise the health and safety of individuals affected by our operations. We are committed to upholding the highest standards of health and safety compliance, proactively identifying and mitigating risks, and fostering a culture of safety throughout the organisation.

Our assurance framework should be read in conjunction with this document to understand how we undertake assurance in line with our risk appetite.

Specific first line assurance is detailed in the accompanying Electrical Management Plan/Procedure.

9.0 Document Details

Owner: Paul Coates- Chief Customer Officer

Approved By: Bromford Flagship Board

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Share to website: Yes/No

Version Control

Renewal Date	Version	Approved By	Comments