

# Water Hygiene Policy

Department Policy Health, Safety & Environment

GENERAL - EXTERNAL

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## 1. Purpose

Riverside aims to proactively manage the potential risk to health arising from water systems in buildings owned or managed by The Riverside Group (TRG) and its subsidiaries. This policy and the associated management plan set out the steps TRG will take to identify, assess, and control water hygiene risks.

This purpose of this policy is to ensure TRG meets its obligations under the following legislation and regulations (as amended):

- The Health and Safety at Work etc. Act 1974.
- The Management of Health and Safety at Work Regulations 1999.
- Control of Substances Hazardous to Health (COSHH) Regulations 2002.
- The Housing Act 2004 which introduced the Housing Health and Safety Rating System (HHSRS) and the Housing Health and Safety Rating System Regulations 2005.
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).
- The Water Supply (Water Fittings) Regulations 1999.

TRG will also refer to the following specific guidance and advice on how to comply with the above legislation and regulations:

- HSE Approved Code of Practice (ACOP) L8 – ‘Legionnaires Disease: The Control of Legionella Bacteria in Water Systems’

## 2. Scope

This policy applies to all non-domestic buildings owned or managed by TRG where the responsibility for water systems is under the control of TRG. This specifically includes communal area to residential buildings, offices, shops, commercial units, and community centres.

Building specific lease or management agreements may define legal responsibility. Where clear responsibility cannot be defined, the default position for any non-domestic buildings owned or managed is that TRG will actively manage that risk until a time when clearly defined legal responsibility can be evidenced.

The policy applies to domestic dwellings to the extent of control measures during vacant tenancy periods, when the property is under TRG control, as well as portfolio level risk identification and controls in line with the management plan.

## 3. Principles

UK regulations set out an explicit duty to preventing or controlling the risk from exposure to water borne bacteria. The risks vary with circumstances, ranging from the occupation of a building to activities associated with the repair, refurbishment, and demolition of premises.

The guiding principles of what TRG intends to accomplish through implementation of this policy are as follows:

- Prepare a management plan that is sets out exactly how TRG will manage risk and deliver compliance.

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- Appoint a competent person or persons to manage risk.
- Take reasonable steps to identify and assess sources of risk.
- Prepare a written scheme to prevent or control the risk of exposure to water borne (legionella) bacteria.
- Implement appropriate management and monitoring arrangements for water systems.
- Keep a written record of assessments and monitoring activities.

#### 4. Further Information & Support

This policy is to be read in conjunction with:

- TRG Water Hygiene Management Plan
- TRG Building Safety Framework

#### 5. Roles and Responsibilities

Managing Director for Riverside Scotland	<ul style="list-style-type: none"> <li>➤ Policy implementation.</li> <li>➤ Will ensure that adequate resources are made available to enable the objectives of the policy to be met.</li> </ul>
Head of Service Delivery	<ul style="list-style-type: none"> <li>➤ Responsible for delivery of the key policy objectives.</li> <li>➤ Responsible for designing and implementing suitable and sufficient operational procedures, including approval of the Water Hygiene Management Plan.</li> </ul>
Asset and Compliance Manager	<ul style="list-style-type: none"> <li>➤ Responsible for the implementation of the Water Hygiene Management Plan.</li> <li>➤ Will ensure all appointed individuals have the appropriate levels of skills, knowledge, education, and training.</li> </ul>
Head of Health Safety & Environment	<ul style="list-style-type: none"> <li>➤ Responsible for ensuring the policy is kept up to date with prevailing legislation and statutory obligations.</li> <li>➤ Liaising with and monitoring enforcement actions from Health &amp; Safety Executive (HSE) or any other enforcing authority responsible for regulating health and safety law.</li> </ul>

#### 6. Risk Thresholds

Whilst the strategic approach to Building Safety is not risk averse in terms of adopting innovation and striving to be a leader in the sector, the safety of Riverside customers and colleagues is a key priority for the organisation. Therefore, there is no appetite for risk in terms building safety and compliance with the law.

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There is however a tolerance for risk in adopting a proportionate approach to building safety activities, risk assessment and the controls implemented.

Key risks are monitored through a set of monthly Key Performance Indicators (KPI's). The suite of KPI's is embedded with the executive management and governance reporting structure.

A building safety risk register is maintained and regularly reviewed to ensure a proactive approach to risk identification, reduction, and control.

## 6. Equality, Diversity, and Inclusion

Riverside is committed to Equality, Diversity & Inclusion. We strive to be fair in our dealings with all people, communities, and organisations, considering the diverse nature of their culture and background and actively promoting inclusion. This policy aligns with Riverside's Equality, Diversity and Inclusion Policy and has been subject to an Equality Impact Assessment.

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