Solihull Community Housing
Shaping our neighbourhoods

Water Safety Policy
2026

Lead officer	Head of Building Safety and Compliance
Approval Chain:	ELT
Last reviewed on:	June 2026
Next review date:	June 2028

Version Control:

Version	***Date***	***Reason for Change***
1.0	*June 2023*	*New Policy*
2.0	*September 2025*	*Amended following internal audit. Removal of process and procedure from policy*
3.0	*June 2026*	*Section 3.6 amended to correctly state frequency of water risk assessments as every 2 years.*

Solihull Community Housing (SCH) manages and maintains council homes and delivers housing services on behalf of Solihull Metropolitan Borough Council (SMBC). Although SCH provides day-to-day housing services, the Council remains the owner of the housing stock and is your landlord. The Council retains the responsibility for ensuring your home is managed in line with the Consumer Standards.

1. Policy Objectives

1.1 The purpose of this policy is to outline Solihull Community Housing's (SCH) approach to managing water safety in properties we manage and control. We recognise that we have a duty of care towards employees, residents, contractors, visitors, and others who may be at risk from water systems in properties that SCH manages and controls.

1.2 This policy provides a framework within which water systems will be managed and key roles for its implementation. The policy forms part of our wider organisational commitment to driving a health and safety culture amongst staff and contractors (as detailed within our Health and Safety Policy).

1.3 The Water Safety Management Plan (WSMP) will provide SCH's operational approach to managing water safety including monitoring arrangements, inspections, risk management, access procedures and emergency protocols.

1.4 The operational procedures in the WSMP set out how SCH will meet the statutory obligation outlined in this policy and is therefore enforceable through this policy.

2. Introduction

2.1 Legionnaires' disease is a lung infection you can catch if you breathe in tiny droplets of water containing bacteria that cause the infection. It is uncommon but can be very serious. It is usually caught when the bacteria have got into the water supply.

2.2 Legionella bacteria can survive under a wide variety of environmental conditions but reproduce to high numbers in stagnant water at temperatures between 20 °C and 45 °C. The organisms will not survive above 60 °C and do not appear to multiply below 20 °C. They may however remain dormant.

2.3 Legionnaires disease is normally contracted by inhaling small droplets of water (aerosols), suspended in the air, containing the bacteria. The risk is increased where:

a) Water temperatures are between 20 and 45 °C
b) There are deposits that can support bacterial growth
c) Aerosol can be produced and breathed in
d) Employees, residents, visitors etc. are more susceptible to infection due to age, illness, a weakened immune system, and gender, with males being more susceptible than females

2.4 Water system design and operation, temperature control, treatment and monitoring of the water and recommended cleaning and disinfection procedures must be considered if the risk is to be minimised.

3. Policy Statement

3.1 SCH is committed in so far as reasonably practicable to ensuring the health, safety, and welfare of persons at our premises. There is a reasonably foreseeable risk to health & safety from legionella bacteria and scalding from water systems in SCH controlled premises if not managed accordingly. SCH accepts that it is the Duty Holder for its premises, and has a

responsibility to protect residents, employees, those who work in SCH premises and others from risks arising from water systems.

3.2 SCH will ensure compliance with the Regulator of Social Housing's regulatory framework and consumer standards for social housing in England; the Safety and Quality Standard is the primary one applicable to this policy. The Social Housing (Regulation) Act 2023 changes the way social housing is regulated and may result in future changes to this policy.

3.3 The Management of Health and Safety at Work Regulations 1999 and the Health and Safety at Work Act 1974 place a duty on us, as an employer and ALMO to ensure our employees and others affected by our undertakings (for example, customers), are not exposed to health and safety risks, including the risk from legionella.

3.4 We have a legal obligation under the Control of Substances Hazardous to Health (COSHH) to prevent or control exposure to biological agents, including legionella.

3.5 To meet our statutory duties in in relation to Water Safety, SCH will follow the Health and Safety Executive's "L8 Approved Code of Practice and Guidance - 2013" (L8 ACOP).

3.6 To comply with these requirements SCH will ensure compliance the requirements outlined in L8 ACOP. This will include but is not limited to the following activity:

- Identify and assess the sources of risk.
- Employ suitable qualified and competent contractors to carry out risk assessments, inspections and maintenance on water systems.
- Carry out risk assessments every 2 years or sooner if there are changes to the water system or reason to believe that the risk control measures in place are no longer fit for purpose.
- Prepare a scheme (course of action) to prevent or control the risk.
- Implement, manage, and monitor the preventative measures.
- Carry out remedial works recommended by the risk assessor.
- Keep and maintain records associated records.
- When a residential property becomes empty, the water system will then be flushed and recommissioned before the property is let.
- Provide training for those with delegated responsibility

4. Legislative & Regulatory Framework

The main legislation and regulations governing this policy are:

- The Health and Safety at Work Act 1974.
- The Management of Health and Safety at Work Regulations 1999 (Management Regulations). The Control of Substances Hazardous to Health Regulations 2002 (as amended) (COSHH).
- The Social Housing Regulation Act 2023
- The Guidance to the Water Supply (Water Fittings) Regulations 1999

Additional legislation:

- The Workplace (Health Safety and Welfare) Regulations 1992
- Construction (Design and Management) Regulations 2015
- Housing Act 2004
- Landlord and Tenant Act 1985
- Homes (Fitness for Human Habitation) Act 2018
- Data Protection Act 2018

- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Public Health (Infectious Diseases) Regulations 1998
- Water Supply (Water Quality) Regulations 2016
- Water Supply (Water Fittings) Regulations 1999
- Equality Act 2010 and relevant statutory Codes and guidance produced by the Equality and Human Rights Commission.

5. Scope

5.1 This policy applies to all SCH employees, contractors, stakeholders, individuals who may be affected by our activities or services and other persons who may work on, occupy, visit, or use SCH managed or controlled premises.

5.2 This policy applies to the following locations:

- Rented properties
- Communal areas
- Offices and storage facilities
- Leasehold and shared ownership premises where SCH retains the responsibility to maintain all or part of the building.

6. Key Roles and Responsibilities

Role	Responsibilities
Solihull Metropolitan Borough Council	• As the landlord is responsible for ensuring that the housing stock is managed in accordance with legal and regulatory requirements.
SCH Board	• The Board has the overall governance responsibility for ensuring that SCH is compliant with regulatory standards, legislation, and codes of practice. The role of the Board includes: • Establishing key H&S policies. • Awareness of risks and risk controls in place. • Agree performance targets and a performance monitoring framework. • Ensuring availability of adequate resources and competencies for delivering policy commitments • Ensuring appropriate reporting and auditing activity • Ensuring residents' voices are heard.
Chief Executive	• The Chief Executive is the appointed Duty Holder and has ultimate responsibility for health and safety across the organisation and will nominate appropriately qualified and suitable experienced people to discharge those duties in relation to the management of water systems safety.
ELT	• Overall responsibility for the implementation of this policy and ensuring that adequate resources are made available to enable the policy objectives to be met. • To ensure that appropriately qualified and suitably experienced people are employed to implement this policy, that appropriate programmes of work are in place to discharge relevant duties.

Head of Building Safety and Compliance	• Ensuring the water safety management plan is implemented, relevant, current, and practical. • To ensure that all activity required for compliance with this policy is carried out. Provision of quarterly performance reports for the Board as part of the monitoring framework. • Reviewing the management plan every 12 months with all relevant parties to ensure the systems outlined in the plan are working.
Building Safety Manager	• Administer associated contracts and act as the first point of contact for water systems related queries. • Ensure effective management of SCH's water safety programme and works. • Ensure that water safety information is available for those carrying out work in SCH premises. • Liaising between the employees, contractors, water suppliers /professionals, and residents about matters pertaining to all water system installations in properties managed or owned by SCH.
Employees, Residents and Contractors	• Adhere to the framework set out in this policy

7. Communications

7.1 A copy of this policy will made available to all stakeholders on the SCH website, to new tenants during the tenancy sign-up process, when new tenants move in following mutual exchanges and when major works is undertaken in homes.

7.2 SCH staff managing contracts and projects will ensure that appropriate water safety information is provided to contractors prior to commencement of works.

7.3 SCH will ensure effective emergency procedures are in place and that staff and contractors are clear on their responsibilities.

7.4 SCH will promote water safety awareness through training and induction of relevant staff. The training will be designed to fit the needs and roles of the employees being trained.

7.5 To ensure that appropriate and suitable training is provide to staff, SCH will carry out training needs where appropriate.

8. Meeting individual needs and reasonable adjustments

8.1 SCH values equality, fairness and inclusion, and recognises that our residents represent diverse communities. We fully recognise the need to ensure that all tenants are treated fairly and can have equal access to our homes and services. We will ensure that when we come across individual needs, we will do our best to keep people safe from harm and hazards. This means communicating with residents in diverse ways by offering translation and interpretation, offering or explaining information in alternative languages and formats and working with carers, families and advocates for those with vulnerabilities and young adults setting up a home for the first time.

9. Equality, Diversity and Inclusion summary

9.1 SCH is committed to valuing and promoting equality and diversity and inclusion across our services. We recognise our duty to eliminate unfair treatment and discrimination in the services we provide and to promote and value respect in everything we do. We expect our staff and

residents to share these values and treat all customers with fairness and respect. We also require our contractors and suppliers to mirror our values and comply with our policies in this respect and their own respective duties.

9.2 SCH will apply a zero-tolerance response to acts of discrimination, bullying, harassment and domestic abuse.

10. Monitoring & Review

Monitoring Arrangements

10.1 SCH has adopted and is undertaking surveys in accordance with the Regulatory standard tenant satisfaction measures. These will be utilised to address any reports on outstanding works, issues or concerns that warrant further action or learning and will be shared with out contractors delivering services. Key Performance indicators in respect of this policy will be monitored through our Performance Management Framework.

Review

10.2 This policy will be reviewed every two years by Head of Building Safety and Compliance unless there are any significant changes to current legislation or regulation, good practice or guidance, or as the result of the outcome of an incident review or Ombudsman determination.