

Aster Group is the overarching brand name of Aster Group Ltd and all of its subsidiaries.

1 Scope

- 1.1 This policy applies to all Aster colleagues, contractors, customers and visitors to Aster premises.
- 1.2 This policy extends to properties owned and/or managed by entities of the Aster Group except leasehold.

2 Policy Statement

- 2.1 We will ensure, so far as is reasonably practicable, that our customers, visitors, colleagues, and contractors are properly protected from the risks arising from water storage and distribution systems.
- 2.2 We will ensure we are compliant with all relevant legislation, including by following the Approved Code of Practice (ACOP) L8 – ‘Legionnaires Disease: The Control of Legionella Bacteria in Water Systems’, and supporting guidance HSG 274.
- 2.3 To achieve this, we will;
 - 2.3.1 Carry out a (desktop) Portfolio Risk Assessment and identify Blocks where water may be shared between dwellings, or available in common parts. Blocks identified as higher risk will require an initial Water Risk Assessment [WRA]
 - 2.3.2 For each block, if required by a WRA prepare a written Scheme of Control identifying activities to reduce risk from legionella and other hazards. The scheme will be included in the WRA.
 - 2.3.3 Repeat WRAs at the intervals set out in Appendix A.
 - 2.3.4 Implement the Scheme of Control including arranging programmes of routine monitoring and sampling of water systems, temperature testing and flushing and modifications to any deficient systems and equipment. All activities will be completed in line with the intervals set out in Appendix A.
 - 2.3.5 Carry out an inspection of the water storage & distribution system in vacated properties and resolve any issues prior to reoccupation. The system will be flushed through all outlets for at least 5 minutes, not more than 7 days prior to occupation.
 - 2.3.6 Put in place an appropriate regime to ensure the risk of legionella is controlled in long term voids/vacant new properties.

Competencies

- 2.4 We will only employ Service Providers who hold the following accreditations:

Activity	Accreditation
Water Risk Assessments	UKAS - Type C Inspection Body ISO/IEC 17020:2012.

Legionella inspection, sampling, and testing	Members of the Legionella Control Association, Water Management Society Relevant UKAS Testing Accreditation or equivalent
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- 2.5 The Responsible Person will have had at least 1 years' experience of managing water safety risks and will have attended, within 3 months of appointment, accredited training for those involved in managing the risk of legionella bacteria in hot & cold-water systems in-line with the ACoP L8 and HSG 274.

Roles and Responsibilities

- 2.6 The Chief Executive Officer retains overall accountability for this policy. Aster is the Duty-holder.
- 2.7 The Health & Safety Director is accountable for ensuring the policy is reviewed and updated (Board for EBHT).
- 2.8 The Property Services Director is responsible for policy implementation and ensuring adequate resources are available to meet the policy objectives. (CEO for EBHT).
- 2.9 The Property Safety Director is accountable for delivery of the key policy objectives and for achieving the associated targets (Director of Housing Services for EBHT).
- 2.10 The Head of Servicing Compliance is responsible for delivery of the key policy objectives and for achieving the associated targets (The Building Safety and Compliance Manager will ensure this this policy is implemented and adhered to in their areas of responsibility for EBHT).
- 2.11 The Contracts Manager (water) is the Responsible Person. The responsible person takes day-to-day responsibility for managing the control of any identified risk from legionella bacteria by implementing the Water Safety Procedures (The Building Safety and Compliance Manager, for EBHT.)
- 2.12 Regional Operations Directors are responsible for water safety management activities in Voids. (The Housing Manager, for EBHT)
- 2.13 The Head of Workspace & FM is responsible for delivery of the key policy objectives and for achieving the associated targets, in Corporate Real Estate. (The Building Safety and Compliance Manager, for EBHT.)
- 2.14 Housing and Independent Living colleagues will support staff & contractors in gaining access where needed.
- 2.15 Customers are expected to report repairs and grant access when requested.
- 2.16 At the discretion of the Executive Board, responsibilities may be otherwise delegated, for example during the integration stage of newer entities to the Aster Group.

3 Monitoring and Review

- 3.1 Assurance measures will be applied as set out in the current version of the Property Compliance Plan.
- 3.2 Aster will monitor implementation of this policy using monthly performance measures as below:

Measure	Type	Reviewed by
No. of blocks with current WRA on file of those required	KPI	GHSP\EB\AGL Board+
No. of overdue High-Risk Actions		
No. of overdue Actions	OPI	Director of Property Services/Director of Housing Services for EBHT
No. of active Actions		
Servicing & safety regimes completed on target (Service Providers)		
Servicing & safety regimes completed on target (in -house)		
Total No. of blocks with out of tolerance bacterial readings		

- 3.3 The effectiveness of this policy will be continuously monitored, and the embedding of the policy scrutinised after 12 months by the *Group Health & Safety Panel*
- 3.4 This policy will be reviewed every 3 years unless business need, regulation or legislation prompts an early review

4 Related Policies and Procedures

- 4.1 Water Safety Procedure
- 4.2 Aster Group Health & Safety Policy

5 Governance

Effective From:	01/09/2022	Expires:	31/08/2025
Policy Owner:	Health & Safety Director		
Policy Author:	Director of Property Safety		
Approved by:	<i>Group Health & Safety Panel</i>		
Delegation Matrix Reference:	R092	Version Number:	v2.1

Aster Group is our overarching company brand and comprises the following companies and charitable entities. Aster Group Limited, Aster Communities, Synergy Housing Limited, East Boro Housing Trust Limited, Central and Cecil Housing Trust, Enham Trust, 55 London, Aster Foundation, Aster Living, Aster 3 Limited, Aster Homes Limited, Aster LD Limited, Aster Property Limited, Aster Solar Limited, Silbury Housing Holdings Limited, Silbury Housing Limited, Central & Cecil Innovations Limited, and Central & Cecil Construction Services Limited.

Water Safety Policy

Appendix A – Timescales and intervals

Water Risk Assessments	
Property category	Max interval
All	24 months or shorter if stated on the WRA
Inspection, monitoring, and safety measures	
Activity	Max interval
Flushing of little used outlets	Weekly
Temperature checks at little used outlets	
Temperature checks of calorifier flow and return; sentinel and communal outlets	Monthly
Clean, descale and sterilise shower heads (communal)	Quarterly
CWST Temperature check	6-monthly
Sampling hot water calorifiers, TMV Servicing, Visual Inspection on Cold Water Storage Tanks	Annual
Corrective action resolution	
Priority	Max Fulfilment time (working days)
Emergency	24 hours
Urgent	15 days
Planned	As set out in WRA