

Water Safety Policy



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Relevant National Standards or Regulations	• Regulator of Social Housing – Safety and Quality Standard • Housing Ombudsman – Complaint Handling Code • HSE Approved Code of Practice L8 – “Legionnaires’ disease: The control of Legionella bacteria in water systems” • HSE Guidance HSG274 Part 2 – “The control of Legionella bacteria in hot and cold water systems” • BS 8580-1:2019 – Water quality – Risk assessments for Legionella control – Code of practice
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Relevant Legislation	• Health and Safety at Work etc. Act 1974 • Management of Health and Safety at Work Regulations 1999 • Control of Substances Hazardous to Health Regulations 2002 (COSHH) • Water Supply (Water Fittings) Regulations 1999 • Landlord and Tenant Act 1985 (repair and fitness obligations) • Defective Premises Act 1972
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1. Purpose

This policy outlines how Harbour Light Assisted Living CIC (“Harbour Light” or “HL”) manages and ensures the safety and hygiene of hot and cold-water systems in all its residential properties. It establishes Harbour Light’s approach to controlling the risk of Legionella bacteria (which can cause Legionnaires’ disease) and preventing scalding injuries. The policy demonstrates compliance with relevant health and safety laws and codes of practice and sets out the responsibilities and procedures needed to protect tenants, staff, and visitors. Harbour Light is committed to a **proportionate, risk-based approach** to water hygiene, implementing controls appropriate to the low-risk domestic water systems predominant in its housing stock.

2. Scope

This policy applies to all Harbour Light Assisted Living CIC supported accommodation properties, including both shared accommodations (e.g. multi-tenant houses or flats with communal areas) and sole-occupancy units, as well as any ancillary residential premises under Harbour Light’s control. It covers hot and cold water systems in these properties, regardless of type (e.g. combi boilers, instantaneous water heaters, unvented cylinders,



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calorifiers, or cold water storage tanks). The policy is intended to ensure water safety in tenants' homes and any communal facilities, and it extends to how Harbour Light works with support partners or contractors in managing water hygiene. All staff, contractors, and Support Companies involved in property maintenance or tenant support must adhere to this policy. Tenants are also expected to cooperate by following the guidance provided (see Tenant Guidance Sheet) and reporting any water safety concerns.

System Types Covered: The majority of Harbour Light properties are equipped with combination boilers or instantaneous water heaters, meaning there is no stored hot water, and cold water is supplied directly from the mains (no attic storage tanks). These modern systems inherently carry a lower risk of Legionella due to regular water throughput and lack of stagnant storage. A minority of properties, however, contain stored water systems – for example, unvented hot water cylinders, calorifiers, or cold-water storage tanks (CWSTs). This policy's controls account for both scenarios, with enhanced precautions where water is stored.

3. Responsibilities

Overall Duty Holder: Harbour Light, as the landlord and property owner, is the duty holder responsible for managing health and safety in its water systems. The Chief Executive (or designated senior manager) has ultimate accountability for ensuring compliance with Legionella control duties under health and safety law. Harbour Light will appoint a competent Responsible Person (e.g. a Property Compliance Manager or Maintenance Manager) to oversee the implementation of this Water Safety Policy and Legionella control measures. The Responsible Person ensures risk assessments are carried out, recommended actions are implemented, and that this policy and associated procedures are followed.

Harbour Light Staff and Contractors: Harbour Light's maintenance and property management staff are responsible for day-to-day compliance with water safety procedures. They must coordinate necessary assessments, maintenance, and remedial works. A qualified plumber or heating engineer (employed by or contracted to Harbour Light) will carry out specific control measures – for example, servicing thermostatic mixing valves and hot water systems, inspecting any tanks, and addressing any identified issues. Gas Safe engineers conducting annual gas appliance checks will also note relevant hot water temperatures or issues during those visits (as part of an opportunistic monitoring approach). Harbour Light ensures all contractors engaged for water system work (risk assessors, plumbers, etc.) are competent and qualified, following industry best practices and Harbour Light's safety standards.

Support Companies (Care/Support Staff): In some Harbour Light properties (particularly those housing tenants with **Autism or Learning Disabilities** where on-site support staff are present), external Support Companies have responsibilities that intersect with water safety. These support staff are expected to carry out certain routine tasks for tenant welfare, such as regular cleaning of outlets (e.g. descaling showerheads) and may record outlet temperatures to prevent scalding in vulnerable tenants. While these activities are primarily for infection control and scald prevention within the care setting, Support Companies must cooperate with Harbour Light to ensure safe water use. They should follow the guidance provided by Harbour Light (e.g. **Leaflet HSC1.1** or other instructions for cleaning shower heads) and promptly report any water hygiene or temperature concerns to Harbour Light. Support staff should not adjust landlord-controlled water systems but should notify Harbour Light if they observe issues (e.g. very low hot water temperature or signs of disuse in an outlet). Harbour Light will include clear water hygiene expectations in any agreements or liaison with Support Companies.

Tenants: Tenants have a role in maintaining water safety in their homes. They are expected to use the water systems in a normal manner that promotes water turnover (e.g. running taps regularly during occupancy), and to follow any tenant guidance on safe water outlet use (see Annex 3 – Tenant Guidance Sheet). In particular, tenants should not tamper with thermostatic controls on boilers or hot water cylinders, and should regularly clean showerheads if applicable. Tenants must also allow reasonable access for inspections, risk assessments, or maintenance (such as annual gas safety checks during which water checks might be done). If a tenant notices



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any problems – for example, hot water not getting sufficiently hot, unusual smells or discolouration in the water, or an outlet (tap or shower) that isn't used for long periods – they should inform Harbour Light promptly so that appropriate action can be taken. Tenant complaints related to water quality or safety will be addressed in line with Harbour Light's Complaints Policy and the Housing Ombudsman's Complaint Handling Code (see Section 5.9).

Management and Board: Harbour Light's senior management is responsible for approving this policy and ensuring that adequate resources (financial and human) are allocated for its implementation – e.g. commissioning of risk assessments and any necessary remedial works. The Board (or equivalent governing body) will receive reports on compliance with water safety obligations as part of Harbour Light's health and safety monitoring (e.g. being notified of any significant findings from Legionella risk assessments or incidents). They will also ensure the policy is reviewed periodically (see Section 6) and remains fit for purpose.

4. Legislation and Regulations

This Water Safety Policy is designed to ensure compliance with all relevant legislation, regulations, and sector standards, including:

- **Health and Safety at Work etc. Act 1974** – General duty to ensure the health and safety of employees and others (including tenants and visitors) so far as reasonably practicable. This Act underpins the requirement to control risks like Legionella in premises under our control.
- **Control of Substances Hazardous to Health (COSHH) Regulations 2002** – Legionella bacteria is classified as a hazardous substance; we must assess and control the risk of exposure to hazardous substances in water systems under these regulations.
- **Management of Health and Safety at Work Regulations 1999** – Require risk assessments and suitable control measures for all workplace hazards, including those in housing provided by an employer or landlord (we treat our housing stock as part of our undertaking for safety management purposes).
- **HSE ACOP L8: "Legionnaires' Disease – The control of Legionella bacteria in water systems"** – The HSE's Approved Code of Practice L8 provides specific guidance for duty holders on how to comply with legal duties for Legionella control. Harbour Light adheres to ACOP L8's principles, including appointing a competent, responsible person, conducting Legionella risk assessments, and implementing proportionate control schemes.
- **HSE HSG274 Part 2** – HSE's technical guidance Part 2: "The control of Legionella bacteria in hot and cold water systems" offers detailed best practices for managing domestic-type water systems. We follow HSG274 Part 2 recommendations relevant to our properties (e.g. hot water storage temperature settings, outlet flushing principles, etc.).
- **BS 8580-1:2019 (British Standard Code of Practice for Legionella Risk Assessment)** – We ensure that any Legionella risk assessments carried out for our properties conform to the best practice methodology outlined in BS 8580-1:2019, to guarantee thorough and competent evaluations of risk.
- **Regulator of Social Housing (RSH) Safety and Quality Standard** – This regulatory standard requires registered housing providers to "meet all applicable health and safety requirements" in the homes we manage. By implementing this Water Safety Policy, Harbour Light is meeting the Safety and Quality Standard obligation to control water-related hazards and ensure tenant safety in their homes.
- **Housing Ombudsman's Complaint Handling Code** – Although not directly related to technical water management, this code sets expectations for handling tenant complaints. If a tenant raises a complaint regarding hot water supply, water quality, or related safety concerns, Harbour Light will manage that complaint in accordance with the Complaint Handling Code (e.g. timely acknowledgement, fair investigation, and response), demonstrating our commitment to accountability and resident safety.

Harbour Light also considers guidance from the Health & Safety Executive (e.g. "Legionella and landlords' responsibilities") and industry best practices in water hygiene. Even though residential landlords are not

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required to obtain formal “Legionella test certificates” for every property, we maintain a robust risk assessment and control regime to fulfil our legal duties and protect our tenants.

5. Procedures

Harbour Light adopts a risk-based, “**low-risk, low-intervention**” control scheme for water hygiene, consistent with the nature of its properties. The primary strategy is to maintain hot water hot, cold water cold, and keep water moving through regular use. The following procedures outline how we assess risk and implement controls:

5.1 Legionella Risk Assessment

Harbour Light will conduct a **Legionella Risk Assessment** for each property in its portfolio, carried out by a competent person (either a trained Harbour Light staff member or an external specialist consultant). Given that our properties are domestic dwellings, the risk assessments are relatively simple and proportionate; they focus on identifying any conditions that could allow Legionella growth (such as stagnant water, stored water at suboptimal temperatures, or infrequently used outlets). In line with HSE guidance, a detailed or costly assessment is not usually required for typical residential settings. If a property meets the “typical low-risk” criteria (regular daily water usage, mains-fed cold water with no tanks, instantaneous hot water heaters, etc.), the assessment will reflect that no significant risks are present and that simple controls are sufficient. For the few properties with more complex systems (unvented cylinders, storage tanks, or multiple plumbing branches), the assessment will note any specific risk factors.

Frequency of Assessments: There is no statutory requirement for how often to review a Legionella risk assessment for domestic properties. However, Harbour Light will review each risk assessment at least every 2 years, or sooner if there is reason to suspect it is no longer valid (e.g. if changes are made to the water system or if an incident occurs). Reviews may be aligned to other maintenance visits for efficiency. We keep records of risk assessments and reviews on file as a good practice, even though not legally mandated for our size of organisation.

Risk Rating: Each property’s Legionella risk assessment will include a simple risk score and rating. Harbour Light uses a scoring model to categorise risk level: a total score from 0–5 points indicates **Low Risk**, 6–10 points **Medium Risk**, and above 10 points **High Risk**. (See Annex for details on the scoring criteria.) In all cases so far, our properties have been assessed as “**Low risk**”. A low-risk outcome typically means no further special measures are needed beyond our standard good practices. If any property were ever rated Medium or High risk, we would take additional steps as described in Section 5.8 (Risk Control Actions and Timeframes).

5.2 Water System Design and Maintenance

Harbour Light’s approach relies first on inherent design controls in our water systems: most homes have modern combi boilers or instantaneous water heaters, which do not store hot water and thus minimise Legionella risk. Cold water is provided directly from the mains in these homes, ensuring it remains cold and fresh (no stagnant roof tanks). These system designs are maintained through our regular asset maintenance programs:

- **Boilers and Hot Water Heaters:** All gas-fired combi boilers are serviced annually (under our Gas Safety Policy) by Gas Safe engineers. This ensures that hot water heaters are functioning correctly and can heat water to the required temperature on demand. Electric water heaters (if any) or point-of-use heaters are likewise checked periodically. During these routine services, the engineer or plumber will verify the hot water **output temperature** at an outlet to confirm it is reaching safe levels (typically at least ~50°C at taps). This opportunistic temperature check, done at least annually during gas safety checks or servicing, substitutes for a formal ongoing temperature monitoring regime.



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- **Hot Water Cylinders and Calorifiers:** In the few properties that have unvented hot water cylinders or calorifier tanks (where these systems are present), Harbour Light ensures that these units are set to store water at or above 60°C at all times. The thermostat settings on these cylinders are checked during annual servicing visits. We have a program to phase out these stored hot water systems and replace them with combi or instantaneous systems; until replacement, we implement proportionate annual servicing: a qualified engineer will inspect these cylinders/tanks *once per year* to verify temperature, check for sediment or stagnation, and ensure any protective anode or other safety features are in good order. This annual check is an interim control to manage risk in stored hot water systems pending their decommissioning.
- **Cold Water Storage Tanks (CWSTs):** A small number of Harbour Light properties contain cold water storage tanks (cisterns) in the building. These tanks (identified in legacy installations at certain properties) have been inspected within the last 2–3 years and were found to be in good condition – kept clean, securely covered with tight-fitting lids, and adequately insulated. No visible debris or signs of stagnation were noted. Currently, Harbour Light does *not* operate a routine annual inspection or chlorination programme for these tanks. This is a gap in formal control; however, risk is mitigated by the fact that these tanks are scheduled for removal when the systems are upgraded. In the interim, if our risk assessments or any incident suggests a need, we will carry out ad-hoc cleaning or disinfection. We also ensure basic measures are in place: the tanks remain lidded to prevent debris entry and will not be allowed to deteriorate.
- **Pipework and Dead-legs:** As part of system maintenance or any refurbishment, Harbour Light will remove redundant pipework (dead legs) to prevent stagnant water pockets. Our risk assessments check for any seldom-used branches; if identified, we will either arrange to remove them or, if removal isn't immediately feasible, ensure they are flushed periodically (see Flushing below).

5.3 Temperature Control and Monitoring

Maintaining proper water temperatures is a key control for Legionella. Harbour Light follows HSE guidance to “keep hot water hot and cold water cold” in all systems:

- **Hot Water Temperature:** For systems with stored hot water (cylinders), the thermostat is set to at least 60°C so that any Legionella bacteria are killed. For instantaneous systems (combi boilers), water is heated on demand; we ensure these appliances are capable of delivering hot water of at least 50°C at outlets within one minute of running. In practice, most combi boilers are set to provide water around 50–55°C to balance scald risk and Legionella control. Harbour Light does *not* routinely log hot water temperatures at outlets on a monthly basis (as might be done in larger or higher-risk buildings); instead, we conduct spot temperature checks during other maintenance activities: e.g. during the biennial Thermostatic Mixing Valve servicing (see 5.6) and during annual gas safety checks. This opportunistic monitoring approach is in line with HSE advice that where regular access is difficult, checks can be done during mandatory visits like gas checks. If any spot-check finds hot water below the acceptable temperature (for example, significantly under 50°C at a tap, indicating a possible boiler or thermostat issue), we will investigate and take action (adjusting settings or repairing equipment). Tenants or support staff are also instructed to report if they consistently observe a lack of hot water.
- **Cold Water Temperature:** We ensure cold water from the mains is kept cold by insulating pipes where necessary and by avoiding storage. In practice, mains cold water in our region is generally well below 20°C. We do not perform routine temperature logging on cold outlets, but during risk assessments or maintenance visits, if a cold tap runs warm after initial flow, it will be noted for further investigation (it could indicate a pipe run too close to heat or a tank issue). Thus far, no issues with cold water temperatures have been identified in our properties.
- **Thermostatic Mixing Valves (TMVs):** TMVs are devices installed on some hot water outlets (taps or showers) to blend hot and cold water and deliver a safe temperature to the user (typically ~41–45°C for bathing). Harbour Light has installed TMVs only in certain properties serving tenants with high scald-risk



(e.g. some Autism/LD properties where support staff assist with bathing). TMVs are *not* standard in all properties. Where present, TMVs introduce a potential Legionella risk (because they mix water and can create warm “tepid” sections of piping). To mitigate this, Harbour Light ensures that all TMVs under our control are serviced and tested every 2 years by a qualified plumber. The servicing involves cleaning the valve, verifying it is functioning properly, and checking that the fail-safe operates (to prevent hot surges). During this service, the plumber will also measure the mixed outlet temperature to ensure it’s appropriately set (preventing scalds while not being excessively low). Note that routine monitoring of each TMV’s temperature is not performed outside the 2-year service schedule unless a concern is raised. Support staff in properties with TMVs may do casual checks (e.g. using a thermometer to ensure bath water is at a safe temperature for a client), but those are care-related measures rather than Legionella controls. Harbour Light’s Legionella risk in these instances is managed by maintaining the upstream hot water at 60°C and ensuring the valves are kept clean internally and working.

- **Scald Prevention vs Legionella Control:** We recognise a balance between hot water temperature for Legionella control and the need to prevent scalding, especially for vulnerable tenants. Our policy is to maintain system temperatures as per HSE guidance (store at ≥60°C, distribute hot water ideally above 50°C) and then use engineering controls (like TMVs in targeted locations) to reduce scald risk at the point of use. This approach keeps Legionella risk low in the bulk of the system while protecting tenants at the outlet. Tenants/support staff are reminded not to lower boiler or cylinder temperature settings on their own. If a tenant feels the water is too hot, they should contact Harbour Light to discuss solutions rather than adjust temperatures.

5.4 Flushing of Little-Used Outlets

Routine Flushing Regime: Harbour Light does *not* operate a scheduled weekly flushing programme for infrequently used outlets across all properties. In typical domestic settings with regular daily water usage, a separate flushing regime is usually unnecessary. Our risk assessments have generally classified our properties as low risk in part because daily water usage is inevitable – tenants use kitchens and bathrooms regularly, which turns over the water. Therefore, we have not imposed additional weekly flushing tasks on staff or tenants as a rule.

However, we recognise that periods of disuse can occur (e.g. a room that isn’t used, or a property that becomes void/vacant). In such cases, flushing is done opportunistically or as needed:

- In properties where there are on-site support staff (Autism/LD schemes), those staff may occasionally flush little-used outlets as part of their general housekeeping routines (especially if they are aware a particular bathroom is seldom used by tenants). Harbour Light will encourage Support Companies to flush infrequently used taps/showers *if practicable*, roughly on a weekly basis, but this is not strictly documented or enforced by HL. There is no formal record-keeping of such flushing.
- **Void Properties:** Whenever a property or a room in a shared house has been vacant for some time, Harbour Light will ensure a thorough flush of all water outlets prior to re-letting to a new tenant. This typically happens during the void inspection or just before the new tenancy sign-up. The flushing involves running all taps and showers for several minutes (with hot water turned to maximum) to draw fresh water through. Either Harbour Light maintenance personnel or the Support Company staff (if they are managing the property during void periods) will carry out this pre-occupation flush. Again, while this action is undertaken as standard practice, it may not be formally logged in every case due to the short turnover periods involved.

For prolonged void periods (which are rare in our service, but if a property were to remain empty for an extended time), Harbour Light would implement a periodic flushing schedule or consider draining the system if appropriate. The principle is that no outlet should sit unused for more than a few weeks without being run.

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Tenants are also advised in guidance (Annex 3) to run taps/showers at least weekly if possible and after returning from any long absence, to maintain water freshness.

5.5 Outlet Cleaning and Descaling

Showerheads and Taps: Regular cleaning and descaling of showerheads and faucet aerators is a recommended control measure to prevent biofilm build-up that can harbour bacteria. Harbour Light, however, does not have an in-house regime for routine showerhead cleaning in its properties. Instead, the responsibility for cleaning shower fittings lies as follows:

- In supported housing settings with independently commissioned Support Companies (e.g. Autism/LD homes), the support staff are expected to include showerhead cleaning as part of their environmental cleaning schedules. Harbour Light has provided guidance (via leaflet *HSC1.1* and training to Support Companies) that showerheads should be removed, cleaned of scale, and disinfected (for example, by soaking in a mild bleach solution) approximately every 3 months. This frequency aligns with general best practice for Legionella control. Support teams document such cleaning in their own site records as part of infection control procedures. Harbour Light may periodically verify with Support Companies that this task is being completed (e.g. during support contract reviews or site visits).
- In properties without on-site support (e.g. general needs or mental health supported housing where tenants live more independently), Harbour Light does not mandate any regular showerhead cleaning. Many of these tenants manage their own cleaning to the extent they are able. As part of tenant guidance (Annex 3), we advise tenants to clean their showerheads regularly for their own safety. We also clarify that if they are unable to do so or notice heavy limescale, they should inform Harbour Light or their support worker so that assistance can be arranged.
- Harbour Light's maintenance contractors will clean outlets opportunistically when working on a system (for instance, if a plumber is replacing a shower hose or fixing a tap, they will flush and clean the fitting as a courtesy). But there is no scheduled program by Harbour Light to individually remove and clean showerheads across all homes.

By delegating routine cleaning to support staff or tenants, we ensure that those who are regularly on-site handle day-to-day hygiene. This approach is considered acceptable given the low Legionella risk profile of our systems (especially where instantaneous heaters are used, the risk from showers is further reduced). Nonetheless, Harbour Light remains responsible for advising and facilitating this control measure. Should a Legionella risk assessment flag a particular high-risk outlet (e.g. an old shower heavily scaled and seldom used), Harbour Light would step in to replace or clean that fixture as needed.

5.6 Managing Vacant or Low-Use Properties

When properties or individual rooms are unoccupied, special care is needed to prevent water stagnation. As noted in Section 5.4, Harbour Light will ensure a flushing regime during vacancy as appropriate. Specifically:

- If an entire property is empty for an extended period (more than 1 month), a member of Harbour Light's team (or appointed agent) will visit at least monthly to run all outlets, or will drain down the water system if practical and if reoccupation is not imminent. This action will be determined on a case-by-case basis, considering season and risk (for instance, in Winter, we might not drain to avoid pipe freeze issues, opting for periodic heating and flushing instead).
- For partially vacant shared houses (e.g. one tenant in a shared house has moved out, others remain), the remaining tenants or support staff will be requested to occasionally run the taps and shower in the vacant room to keep it fresh (or Harbour Light staff will do so during property inspections). Prior to a new tenant moving into that room, a full flush and, if deemed necessary, a precautionary disinfection (e.g. spraying the showerhead with disinfectant) will be done.



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- We do not generally chlorinate or chemically treat systems during standard void periods, as our water supplies are chlorinated by the water utility and simple flushing is deemed sufficient in low-risk domestic systems.

All these measures ensure that even during periods of non-use, water is “kept moving” to prevent stagnation and bacterial growth.

5.7 Record-Keeping and Monitoring

Harbour Light maintains records to evidence its compliance with water safety duties, albeit scaled to the nature of our operations:

- **Risk Assessment Reports:** We retain copies of all Legionella risk assessments and review notes for each property. These documents detail the state of the water system, risk factors observed, and any recommended actions. Even though not legally required for landlords of our size to keep written records if we have fewer than 5 employees, we choose to do so for accountability and ease of review.
- **Servicing and Maintenance Records:** Records of annual boiler/gas safety checks, as well as the biennial TMV service reports, are kept on file. These often contain notes on water temperatures and any actions taken (e.g. “TMV on Bathroom sink adjusted/replaced on [date]”).
- **Remedial Actions:** If a risk assessment or inspection identifies an issue (e.g. a non-lidded tank was found, or a shower needing de-scaling by maintenance), we document when that was rectified.
- **Support Company Logs:** Harbour Light may not directly hold the cleaning logs from support staff (e.g. showerhead cleaning schedules), as those are internal to the Support Company’s procedures. However, through our partnership arrangements, we will periodically obtain assurance that such tasks are being done (for example, via email confirmation or during site audits). Any significant non-compliance by a Support Company in performing agreed water hygiene tasks would be escalated to Harbour Light management to address with the provider.
- **Temperature/Flushing Logs:** As noted, we do not have formal ongoing temperature monitoring logs or flushing checklists for each property, since these are not routine activities for us. We rely on integrating water checks into other procedures and on tenant/staff vigilance. If, during a gas check or visit, a temperature is recorded, it will be noted on that job sheet rather than a separate log. Similarly, a void property flush is usually indicated on the void inspection checklist. We aim to keep procedures simple to encourage compliance, rather than impose excessive paperwork on staff for minimal-risk scenarios.

Overall, record-keeping is maintained at a level to demonstrate that we have assessed Legionella risks and taken reasonable steps, which is important should we ever need to evidence our compliance (for instance, in the unlikely event of a Legionnaires’ disease case, we can show our risk assessment and control measures were in place).

5.8 Remedial Actions and Escalation of Risk

Although all Harbour Light properties are currently assessed as low risk for Legionella, we have predetermined action plans should any Medium or High-risk conditions be identified:

- **Low Risk (Score 0–5):** The existing control measures are considered sufficient. We will simply maintain our routine measures (as described in this policy) and review the risk at the next scheduled interval (or sooner if changes occur). Typical low-risk situations include having combi boilers, regular daily water use, and no stored water. No immediate additional action is needed for low risk beyond continuing good practice.
- **Medium Risk (Score 6–10):** This indicates some moderate risk factors present (for example, a property with a warm cold-water tank, or several seldom-used outlets). In this case, Harbour Light will implement



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additional control measures within a reasonable timeframe, generally within 1 to 3 months of the risk assessment. Such measures could include: increasing flushing frequency (or formally scheduling it), installing additional insulation or raising hot water temperatures, cleaning/disinfecting a tank or pipework, or minor plumbing alterations to remove dead legs. The aim is to reduce the risk to low as soon as practicable. Progress on these actions will be monitored by the Responsible Person and documented once completed. After completing actions, the risk assessment may be updated to reflect the new lower risk state.

- **High Risk (Score >10):** This denotes a significant risk of Legionella proliferation or exposure (for instance, a heavily contaminated system, or one with major design flaws). If a high risk were ever identified, Harbour Light would treat it with urgency. Immediate interim measures would be taken – e.g. flushing the system, raising temperatures, or even temporarily shutting down certain outlets – to protect occupants. A longer-term remedial plan would be executed within 1 month or less, potentially involving professional water treatment contractors. For example, this could include a full system disinfection/chlorination, replacement of outdated equipment, or installation of additional controls. The affected tenants and any support staff would be informed of the issue and advised on precautions (such as not using certain outlets until fixed, or using boiled water if needed, depending on the scenario). Harbour Light would also consider relocating tenants temporarily if an extreme situation arose (though this is highly unlikely given our simple water systems). After action, a fresh risk assessment would be carried out to confirm that the risk level has been mitigated. Additionally, if Legionella bacteria were found or a case of illness suspected, we would notify the appropriate health authorities and comply with any investigations.

Incident Response: In the rare event that a tenant or staff member is confirmed or suspected to have contracted Legionnaires' disease linked to one of our properties, Harbour Light will immediately engage a specialist water hygiene contractor to conduct a thorough inspection and water sampling from the property. We would support any Public Health England (UK Health Security Agency) inquiries and follow all advice for remedial actions (such as emergency disinfection). Internally, such an incident would trigger a review of what went wrong and whether our risk control scheme needs revision. Our priority would be to ensure the safety of all other tenants by checking if similar risks exist elsewhere and addressing them.

5.9 Communication and Tenant Engagement

Harbour Light believes that keeping tenants and support partners informed is crucial for effective water safety management. We communicate in the following ways:

- **Tenant Information:** Each new tenant is provided with a **Tenant Guidance Sheet on Safe Water Use** (see Annex). This one-page guide in plain language explains how tenants can help keep their water safe (e.g. by regular use of outlets, cleaning showerheads, and reporting issues). It also assures them of what Harbour Light is doing in the background (e.g. maintenance and risk assessments), so they understand the partnership in safety.
- **Support Company Liaison:** We include water safety topics in our regular liaison meetings with Support Company organisations. For example, we'll remind them of the importance of tasks like shower cleaning and discuss any difficulties they face so we can support or adjust our approach. If any changes to our procedures occur, we will inform Support Companies in writing so they can align their staff's practices.
- **Signage and Notices:** In any property where a unique risk control measure is needed, we will use simple notices. For instance, if a guest room's en-suite is rarely used, we might place a small note for staff or tenants, "Please run this shower for 2 minutes weekly" as a reminder. In properties with TMVs, we may post a notice near the water heater: "Do not adjust hot water temperature – set for safety. Contact HL if issues." Such notices reinforce the key messages of this policy at the point of use.
- **Responding to Complaints/Concerns:** Should a tenant raise a concern or formal complaint regarding water quality (e.g. "my water isn't hot enough" or "I'm worried about Legionella"), Harbour Light will

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address it promptly under our repairs service and, if not resolved, through the **Complaints Policy**. We aim to resolve any water-related issue as an urgent repair first and foremost. If a formal complaint is logged, we will handle it per the Housing Ombudsman Complaint Handling Code – acknowledging within 5 working days, providing a clear response, and informing the tenant of their escalation rights. We treat water safety issues as potentially serious, so the investigation and resolution of such complaints are expedited. The existence of this Water Safety Policy will help us respond consistently and explain to residents the steps we take to keep them safe.

6. Review and Updates

This Water Safety Policy and its associated procedures will be reviewed at least every three years or sooner if required by significant changes in legislation, regulatory standards, or Harbour Light's operating context. The policy will next be reviewed by **November 2028** (3 years from its effective date), unless an earlier review is triggered by events such as a change in HSE guidance (e.g. new ACOP L8/HSG updates), a material change in our property portfolio (e.g. acquisition of a building with a complex water system), or an incident that indicates a need to strengthen our approach.

Any updates to the policy will be approved by senior management and communicated to all relevant staff, contractors, Support Companies, and (where appropriate) tenants. Interim procedural changes (for example, introducing a new checklist or adding a task frequency) can be made by the Responsible Person, but such changes will be incorporated into this policy at the next review.

Harbour Light is committed to continuous improvement in health and safety. By reviewing this policy regularly, we ensure it remains aligned with best practices and fully compliant with current legislation and regulatory expectations.

(End of Water Safety Policy main document)

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Annex – Water Safety Procedures Manual (SOP)

Approved as part of HAS03 version 1.0

Introduction: The following Operational Annex provides detailed standard operating procedures (SOPs) and guidance to implement the Harbour Light Water Safety Policy. It is intended for use by Harbour Light staff (and contracted maintenance personnel) as well as a reference for Support Company staff where applicable. It includes a matrix of responsibilities, step-by-step procedures for key control measures, and additional technical guidance. All procedures are to be carried out in accordance with the main policy and with due regard for tenant safety and comfort.

A1. Roles and Responsibilities Matrix for Legionella Control

The table below defines “who does what” in our water safety control scheme, consolidating the responsibilities discussed in the main policy. This matrix is adapted from the responsibility framework used at specific Harbour Light properties and generalised for all properties:

Task / Control Measure	Harbour Light (Landlord)	Support Company Staff (if present)	Tenants	Contractors / Others
Legionella Risk Assessment	Schedule and ensure completion of initial and periodic risk assessments for each property. Maintain records.	<i>Provide access and relevant property info to HL or assessor. Use assessment results to inform their routines.</i>	Allow access for assessment. Report any known issues to the assessor if asked.	Conduct risk assessments if engaged (must be competent per BS8580-1). Provide HL with the report and recommendations.
Risk Assessment Review	Review risk assessments every 2-3 years or upon changes. Update control measures/policy as needed.	<i>Advise HL of any significant changes in usage or concerns that might prompt an early review.</i>	Notify HL if changes in water usage (e.g. no longer using a shower) that might affect risk.	Assist with investigations and documentation if requested.
Policy Implementation & Oversight	Designate a Responsible Person to oversee Legionella controls. Ensure all measures below are implemented.	<i>Cooperate with HL's policy; integrate relevant parts into their own site procedures (e.g. cleaning).</i>	Follow guidance and cooperate with measures (e.g. do not adjust heaters).	Cooperate with HL's policy as informed.
Water Temperature Control	Set system design to achieve hot $\geq 60^{\circ}\text{C}$ in storage and $\geq 50^{\circ}\text{C}$ at outlets. Check temperatures during annual service visits. Adjust settings or repair systems if temps out of range.	<i>Monitor for any unusual temperature issues in daily use (especially too low hot water) and report to HL. Do not alter thermostats.</i>	Do not adjust boiler/cylinder settings. Report if it consistently lacks hot water or is too hot.	Gas Safe engineer services boilers annually (ensuring proper temp output). Plumber services cylinders annually.
Thermostatic Mixing Valves (TMVs)	Install TMVs where necessary for scald	<i>In daily support, ensure TMV-</i>	Be aware TMVs are installed	Plumber to test, clean, and recalibrate TMVs

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Task / Control Measure	Harbour Light (Landlord)	Support Company Staff (if present)	Tenants	Contractors / Others
	protection. Maintain inventory of locations. Arrange biennial servicing/testing by a qualified plumber. Replace any faulty units.	<i>controlled outlets are delivering safe temperatures for clients.</i> Report if water is excessively hot or cold at these outlets.	(where applicable) for safety; report if tap water is scalding hot (could indicate TMV failure). Do not tamper with valves.	every 2 years. Document service results and any changes.
Showerhead / Outlet Cleaning	Provide guidance (HSC1.1 leaflet or similar) on cleaning. No routine cleaning by HL staff in individual flats. For communal settings, you may arrange periodic descaling if needed on property inspections.	<i>Clean and descale showerheads, hoses, and tap aerators as part of regular cleaning (recommended quarterly).</i> Keep simple records of cleaning dates. Notify HL if heavy scale or damage is observed.	Clean your own showerheads periodically (advice given). For those unable, allow support staff or maintenance to assist.	(Contractor involvement not usually needed unless replacing heavily scaled outlets during maintenance visits.)
Flushing – Infrequently Used Outlets	<i>General:</i> Rely on normal usage; no weekly flush regime enforced by HL. Void properties: arrange flushing of all outlets before re-letting (by HL staff or contractor). Partially used outlets: during inspections or maintenance visits, flush any that appear stagnant.	<i>If a tenant doesn't use a particular tap/shower often, staff should flush it weekly if possible (running water for 2-3 minutes).</i> Incorporate flushing into support tasks when rooms are vacant or clients are away. Notify HL of any outlet that cannot be flushed or appears faulty.	If comfortable, run little-used taps/showers weekly for a few minutes. When returning from time away, run all outlets to refresh water. (Guidance provided to tenants).	On any maintenance call, plumbers/engineers flush the outlets they work on. During risk assessments, assessors may flush/observe flow to identify stagnation.
Cold Water Storage Tanks (if present)	Ensure tanks are covered, insulated, and structurally sound. Inspect internally at least every 2-3 years (or sooner if risk assessment dictates). Record condition. Plan for removal of tanks long-term.	<i>Report to HL if any changes are noticed (e.g. unusual noise or debris from cold taps, which might suggest tank issues).</i> Generally, not directly involved with tanks.	Unlikely access to tanks (often in lofts); tenants are not expected to check these. However, report any dirty water or odd taste, which could hint at tank contamination.	A plumber or water hygiene specialist to inspect the tank condition periodically. Clean/disinfect tank if directed by HL (e.g. if inspection finds significant debris or biofilm).

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Task / Control Measure	Harbour Light (Landlord)	Support Company Staff (if present)	Tenants	Contractors / Others
Hot Water Cylinders/Calorifiers	Set and lock the thermostat to $\geq 60^{\circ}\text{C}$. Arrange annual service (interim measure until decommissioning) to check temperature and drain flush a sample of water to remove sediment (if drain valve present). Plan for system replacement with a Combi in the asset plan.	<i>No direct role; just observe if the hot water supply seems insufficient and report.</i>	Do not adjust the cylinder thermostat. Report if running out of hot water quickly (could indicate thermostat turned down or other issue).	Qualified heating engineer to service unvented cylinders annually (check expansion vessel, safety valves, and thermostat calibration). Provide service report to HL.
Dead Leg Removal & Plumbing Changes	During renovations or void works, identify any redundant pipework and cap or remove it. Keep pipes as short and direct as possible when installing new plumbing. Document any changes to update the water system schematic for the property.	<i>N/a (Support staff don't alter plumbing)</i>	N/a	Contractors (plumbers) to carry out removals or reconfigurations on instruction from HL. Ensure any new works comply with Water Regulations.
Water Sampling (Testing)	Not part of routine (only done if an outbreak is suspected or as validation after a high-risk issue). If needed, arrange laboratory testing for Legionella.	<i>N/a (Support staff do not sample water)</i>	N/a	Specialist water hygiene contractor to take samples according to BS7592 if requested.
Information and Training	Train relevant HL staff on the basics of Legionella awareness. Provide clear instructions to contractors. Give Support Companies information on their part in Legionella control. Provide tenants with a	<i>Ensure their support staff are aware of this annex's tasks (flushing, cleaning) and trained in any tasks (safe handling of cleaning chemicals for showerheads, etc.). Incorporate water safety into their</i>	Read and follow the tenant guidance. Ask questions if unclear. Immediately inform HL of any health issues that could be linked to water (so we can investigate).	Contractors to ensure they have appropriate qualifications (e.g. plumbing NVQ, Gas Safe, etc.). Any specialist tasks (like tank chlorination) to be done by trained personnel.

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Task / Control Measure	Harbour Light (Landlord)	Support Company Staff (if present)	Tenants	Contractors / Others
	guidance sheet and answer any queries.	<i>support staff inductions for HL schemes.</i>		
Reporting and Communication	Maintain open communication channels: HL to inform support staff and tenants of any work or issues (e.g. if chlorination is to be done, or if hot water will be off for servicing). Provide updates on the resolution of any problems.	<i>Report promptly to HL any issues observed (e.g. "water in room 2's ensuite hasn't been used, we've flushed it" or "tenant X keeps turning off boiler," etc.). Communicate with tenants in their support remit about using water safely (reinforce HL's guidance in daily living support).</i>	Report problems or concerns as per Section 3 responsibilities. Cooperate when notified of works (e.g. allow access, follow any temporary instructions like not using water during disinfection).	Contractors to provide feedback to HL on any observations (e.g. "found heavy scale in tank") and confirm when tasks are complete. They should also interact professionally with tenants if on-site, explaining if water will be briefly shut off, etc.
Complaints Handling	Treat any complaint related to hot water or Legionella risk seriously. Investigate and respond per Housing Ombudsman guidelines. Use complaint outcomes to improve processes if needed.	<i>Assist tenants in raising concerns if they voice them to support staff. Support staff should also communicate any pattern of issues (like tenants often complaining water is lukewarm) to HL management.</i>	Follow the complaints process if not satisfied with water safety or the response to reports. Can complain directly to HL and expect a timely resolution.	– (Contractors may be asked for technical input if the complaint involves their work, e.g. if a tenant says "plumber didn't fix my hot water," HL will follow up with the contractor.)

Legend: *N/a = not applicable.* The above matrix should be reviewed whenever roles or contracts change (e.g. if a new Support Company takes over a property, ensure they agree to these responsibilities). Harbour Light's Responsible Person will oversee that each party is fulfilling their part and provide clarification or training as needed.

A2. Step-by-Step Procedure: Pre-Letting (Void) Flush and Check

Whenever a property or unit is about to be reoccupied after being vacant, perform the following steps to ensure water safety:

- 1. Initial Inspection:** Before the new tenant moves in, a maintenance officer or other designated person visits the property. Check that the water system is turned on and all valves are open (cold mains, hot water supply). Ensure the boiler or water heater is operational (if it was shut down, light it and let it heat up).
- 2. Flush Cold Outlets:** Starting with the cold taps (kitchen sink, bathroom basin cold, bath cold, any outside tap), turn each on fully. Let the water run for at least 2-3 minutes or until the water temperature has stabilised and feels consistently cold. This flushes out any water that has been standing in the pipes.



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While flushing, ensure the water is clear (no discolouration). If any debris is noticed, note it for follow-up.

3. **Flush Hot Outlets:** Next, turn on the hot water outlets one by one. If a combi boiler is present, you may need to do this one at a time to avoid overloading the boiler. Let each hot tap run for **5-10 minutes** or until the water is as hot as it normally gets. Be cautious of hot water to avoid scalds – open the tap slowly. This prolonged flush ensures any cooler water sitting in the heater or pipes is replaced with fresh hot water from the boiler/cylinder.
4. **Flush Showers:** If the property has showers, remove the showerhead if possible (to avoid aerosol spray) and run the shower hose at full hot for several minutes, then full cold, or mixed, to flush both supplies. If the showerhead is fixed or not easily removable, run the shower on hot for a few minutes, then on cold – keep the bathroom door closed and ventilate afterwards to limit aerosol spread.
5. **Toilet Flush:** Flush all toilets at least once. Ensure the cistern refills properly and that no stagnant water remains.
6. **Clean Outlets (if needed):** If the risk assessment or previous usage indicated, consider cleaning the outlets during this process. For example, if the showerhead is visibly scaled, take the opportunity to descale it (soak in vinegar or a chlorine-based cleaner for 10 minutes, then rinse thoroughly and reattach). Wipe any faucet aerators. This step may be skipped if outlets are visibly clean and were cleaned by support staff during the void period.
7. **Hot Water Temperature Check:** After flushing, use a thermometer if available to check the hot water temperature at the kitchen tap (the primary location for the hottest water). It should ideally reach 50°C or higher within one minute. Record the temperature if logging void checks; if below 50°C, ensure the boiler/cylinder is on and set correctly. If it remains low, that indicates a possible issue – arrange for a heating engineer to investigate before the new tenant moves in (to prevent both scald risk if it's too high or Legionella risk if too low).
8. **Cold Water Temperature Check:** The cold water after flushing should feel decidedly cold (generally below 20°C). If it feels warm, that is a concern – check if perhaps the mains was turned off and the water was sitting in sun-exposed pipes. Run it longer or investigate insulation. Typically, mains water will run cool; no precise measurement is usually needed for void checks unless something seems off.
9. **Visual Inspection of Tank/Cylinder (if applicable):** In properties with a loft tank or cylinder, quickly inspect those if accessible. Ensure the tank lid is still secure and no obvious signs of stagnation (e.g. no insects, etc.). For cylinders, ensure the temperature on the gauge (if present) is ~60°C. This is a sanity check; detailed internal inspection is not required at this juncture unless the risk assessment flagged an issue.
10. **Documentation:** Note on the void checklist or property turnover form that the water system was flushed on [date] and any observations (e.g. "All outlets flushed, hot reached ~55°C, cold clear and cold, showerhead descaled"). This serves as a record that we took precautionary steps. While not all void flushes are formally logged, doing so is good practice, especially if the void period was long.
11. **Inform the New Tenant:** Upon sign-up, optionally inform the incoming tenant that the water has been checked and flushed for their safety. Remind them (using the Tenant Guidance Sheet) to run water regularly, especially if they have to leave the property unused in the future.

These steps ensure that any stagnant water is purged and that the system is delivering safe water from the start of the new tenancy. It aligns with HSE's advice to flush out systems prior to letting the property.

A3. Procedure: Thermostatic Mixing Valve (TMV) Testing and Servicing

Where TMVs are installed (see main policy section 5.3 and 5.6), follow this SOP every two years (or more frequently if the manufacturer recommends or if issues are reported):

1. **Preparation:** Gather necessary tools and equipment: thermometer or temperature probe, TMV service kit (replacement seals, filters if required), cleaning brush, disinfectant (for cleaning internal parts if



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needed), and appropriate wrenches. Notify the support staff or tenants in advance that hot water will be briefly turned off or fluctuations may occur during testing. If multiple TMVs in the property, plan to do one at a time to maintain some services.

2. **Isolate Valve:** Shut off the hot and cold supply to the TMV you are servicing (there should be isolating valves on the inlets of the TMV). If not, you may need to shut off the building's supplies – coordinate this to minimise disruption.
3. **Disassemble TMV:** Following manufacturer instructions, remove the TMV cover/cap and internal components. Typically, this involves unscrewing the temperature adjustment mechanism and removing the cartridge. Beware of water discharge – have a towel ready.
4. **Inspect and Clean:** Check the internal elements for scale or debris. Most TMVs have strainers on inlets – remove and clean these of any sediment. Use a small brush to remove scale deposits. If the valve is significantly scaled, soak components in a suitable descaling solution as per manufacturer guidelines (taking care not to damage seals). Also, inspect O-rings and seals; replace any that are worn out.
5. **Reassemble and Set Temperature:** Reassemble the TMV and turn the water supplies back on. Open the outlet (e.g. tap or shower connected to TMV) and let it run. Using the thermometer, measure the mixed water temperature. Compare it to the desired set temperature (for bath/shower typically ~41°C, for basin ~38°C, depending on application and any specific care plan requirements). Adjust the TMV using its adjustment screw or mechanism until the outlet water stabilises at the correct temperature.
6. **Fail-Safe Test:** Test the TMV's fail-safe function – this is crucial. While water is running, quickly shut off the cold supply isolator to the TMV. The flow should reduce to a trickle or stop, indicating the hot supply is being checked (to prevent scalding if cold fails). Restore cold and then shut off the hot supply; cold flow should also shut down (or be significantly reduced) in a thermostatic valve. If the valve does not shut down appropriately when either supply is cut, it is failing and must be repaired or replaced. Often, cleaning and recalibration fix this, but if not, plan to fit a new TMV. Keep the supplies off until replacement if a serious fail-safe issue is found, to avoid an unsafe condition, or at least inform users not to use that outlet.
7. **Restore and Repeat:** Once tested and working, ensure all supply valves are fully open again. Move to the next TMV in the property and repeat the process. It's advisable to start with the highest risk outlets (e.g. those used for bathing vulnerable tenants) first.
8. **Record Results:** Results to be recorded on form TMV Servicing & Safety Compliance Report (TMV-SRV-01). Document the service date, which valves were serviced (location/identifier), the measured outlet temperature post-adjustment, and any parts replaced. Note any valves that were found defective and actions taken (e.g. "TMV at Room 1 basin did not pass fail-safe, replaced with new valve model X on [date]"). This record should be filed in the property compliance records. Also, communicate any major issues to the Responsible Person so they are aware of any systemic problems or frequent replacements needed.
9. **Post-Service Monitoring:** Advise support staff or the tenant to be vigilant over the next day or two for any irregularities (e.g. fluctuating temperatures) and to report back if noticed. This ensures the TMV continues to perform correctly after servicing.

This procedure ensures TMVs continue to protect against scalds without inadvertently increasing Legionella risk (a well-maintained TMV will mix correctly on demand and not create continuous lukewarm conditions). By servicing biannually, we catch any performance issues early.

A4. Guidance for Support Staff: Routine Outlet Flushing and Cleaning

(This section summarises key procedures that Support Company staff should integrate into their regular duties in HL properties where they operate. It can be extracted and included in training for those staff.)

- **Weekly Flush (if feasible):** Once a week, run any tap or shower that a tenant has not used in the last week. For example, if a tenant only uses the ensuite shower and never uses the communal bath, run the



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bath tap and shower weekly. Let the water flow for about 2 minutes on hot and 2 minutes on cold. This helps keep water fresh. Document in your logbook with a simple checkmark or initial if required. If you cannot access a particular room or the tenant refuses, note that and inform your manager/HL.

- **After Vacancies or Absences:** If a tenant was away or a room is empty, when they return (or when a new tenant moves in), flush all their outlets (shower, sink) as above. Ideally, do this shortly before the tenant's return (so water is fresh and warm). If the tenant is returning, you can explain that you are running the taps to make sure everything is clean and safe for them.
- **Showerhead Cleaning (Quarterly):** Every 3 months (or as part of deep cleaning routines), remove showerheads and soak them in descaler. Use gloves and follow any COSHH guidance for the cleaning product. A common method: fill a basin with a dilute bleach solution (per manufacturer's instructions), completely submerge the disassembled showerhead for 10 minutes, then scrub off any scale, rinse thoroughly with clean water, and reattach. Ensure the showerhead is rinsed well to remove any chemical residue. Record the date of cleaning in your records (some sites use a cleaning checklist). If a showerhead is very clogged or damaged, alert Harbour Light maintenance – replacement may be needed.
- **Tap Aerators:** If taps have screw-in aerator nozzles, unscrew and clean those periodically (at least annually, or if you notice reduced flow). They can also be soaked in vinegar or a bleach solution to clear scale. Rinse and replace. This is often done alongside showerhead cleaning.
- **Monitoring Temperatures (Care context):** If part of your support role involves checking water temperature for baths (to prevent client scalding), continue to do so with a thermometer as per your care plan. This is primarily for the safety of the individual. If you find that hot water is coming out *too hot to touch*, even with a TMV (say above 45°C at a sink where a vulnerable person could use it), report that immediately – it could mean a TMV has failed. Conversely, if the hot water never gets warm enough (below ~40°C even after running), report that too – the boiler might not be functioning or may be turned down, which can be a Legionella concern.
- **Observations:** While in the property daily, keep an eye (and nose) on water quality. If you see **discoloured water, unusual odours** (a musty or earthy smell from water), or if tenants complain of any illness that might relate to water, escalate this to Harbour Light. It may be nothing, but it's better to check. Also observe any non-use: e.g. "tenant hasn't used their shower in two weeks because they're bed-bound" – in such cases, you should flush it for them or coordinate with maintenance.
- **Cooperation with Maintenance:** When Harbour Light's contractors come for servicing (boiler check, TMV service, etc.), assist by ensuring they have clear access to all outlets and informing tenants of water shutdowns if any. After they finish, they might ask you to help by running something or keeping an eye on a temp – please do as requested. It's a team effort to maintain safety.
- **Documentation and Reporting:** Use your existing reporting channels to log these activities. For instance, if you maintain a weekly house file, note "Legionella flush done – all outlets [date]". For any urgent issue, follow Harbour Light's reporting line (usually call or email the maintenance contact or on-call number). For non-urgent observations (like minor scale buildup), include it in your next support liaison report.

By following the above, support staff play a crucial part in our collective Legionella control scheme, especially in between the less frequent landlord maintenance visits. Harbour Light greatly values this cooperation, as it adds a layer of ongoing prevention to keep water safe.

A5. Risk Assessment Scoring Model and Action Timeframes

Harbour Light's Legionella risk assessments assign scores to various risk factors to produce an overall risk level. While the detailed scoring criteria are in the risk assessment reports, the outcomes translate to the following categories with required actions:

- **Low Risk (0–5 points):** This indicates that the property's water system has minimal risk factors (e.g. modern system, regular use, no storage, good temperature control). **Action:** No immediate corrective



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actions needed. Maintain standard controls as per this policy. **Timeframe:** Next routine review in up to 3 years. Example: A combi boiler-fed flat with daily use and no dead legs might score 2 (low).

- **Medium Risk (6–10 points):** Some conditions could increase risk (e.g. a small storage tank present, or a guest bathroom rarely used, etc.). **Action:** Implement additional control measures to reduce risk to low. This may include physical modifications or increased monitoring. **Timeframe:** Aim to complete interventions within **3 months** of assessment. Then reassess to ensure risk drops. Example: A house with an old loft tank (scored 7) would need tank inspection/cleaning or replacement to mitigate risk.
- **High Risk (11+ points):** High potential for Legionella growth or exposure identified (e.g. very infrequent water usage AND storage of warm water, vulnerable occupants, etc., or a positive Legionella test). **Action:** Urgent action required. Develop a remedial plan immediately and start mitigation measures **within days**, with full resolution ideally within **1 month**. Consider consulting a specialist contractor. **Timeframe:** Continuous monitoring until risk is controlled; formal review immediately after actions. Example: A system found with heavy contamination or a failed control measure would be high risk and demand a fast response.

Harbour Light's goal is to keep all properties in the Low-risk band. Our investment plan (upgrading old systems) is aligned with eliminating known risk factors (like removing tanks, removing oversized or unused pipe sections). The scoring model helps prioritise actions and ensures we meet our duty to control risks in a timely manner relative to their severity.

(No properties currently fall in the High-Risk category; this framework is in place as a precaution should circumstances change.)

A6. Document Control and Review of Annex

This Procedures Manual is subject to the same review cycle as the main Water Safety Policy (every 3 years or sooner). The Responsible Person should update the annex whenever procedures are improved or changed. All staff who use this manual should be notified of changes.

Any forms, checklists or log templates mentioned (e.g. void flushing checklist, TMV service report form) are available from Harbour Light's Compliance Team. Staff are encouraged to provide feedback on these procedures – if something can be done more effectively, we will consider it in the next update.

(End of Operational Annex)

Tenant Guidance: Safe Use of Water Outlets in Supported Accommodation

Approved as part of HAS03 version 1.0

Dear Tenant,

Your home's water system is managed by Harbour Light to keep it clean and safe. Legionella bacteria (which can cause Legionnaires' disease) and other germs can grow in water if it isn't used or kept at the right temperature. Also, very hot water can cause burns. By following a few simple tips, you can help ensure your water stays safe and avoid accidents. This guidance is for all tenants in our supported accommodation. Please read and keep it for reference. If you have any questions, your support worker or Harbour Light housing officer can help.

1. Keep the Water Moving:

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Use all the taps and showers in your home **regularly**. If an outlet (tap or shower) isn't used often, try to run it at least **once a week** for a couple of minutes. This is because water that sits still can get stagnant. For example, if you have a second bathroom or a kitchen sink you rarely use, run the water there weekly.

- **After being away:** If you have been on holiday or away from your home for more than a week, when you come back, let the cold water run from **every tap** for a few minutes and the hot water until it's hot. Also, flush the toilet. This brings in fresh water.
- **Unused rooms:** If you live in a shared house and one bathroom isn't used by anyone, don't hesitate to run the shower and taps there occasionally just to keep them fresh. (Staff may do this in supported houses, but you can too if you notice it's not been used.)

2. Keep Hot Water HOT (but don't get burned):

Your hot water is set to a temperature that is high enough to kill bacteria. In some homes, especially where vulnerable tenants live, we have special valves to cool the water a bit at the taps to prevent scalding. **Do not adjust the boiler or hot water tank settings** yourself. It's important the hot water system stays at the preset temperature (usually at least 60°C inside the system) to prevent germs.

- **Check before use:** Hot water can be very hot. Always be careful turning on hot taps and test the water with your hand before using it for washing to avoid burns. If you find your hot water is *extremely* hot or *not hot at all*, inform us. A consistently very low hot water temperature could be a problem that needs fixing.
- **Thermostatic taps:** If your home has thermostatic mixing valves (TMVs) on the taps or showers, they are there to protect you from scalds by controlling temperature. Do not tamper with these. If you think a TMV isn't working (e.g. water is suddenly scalding from a tap that was usually safe), let us know right away.

3. Clean Shower Heads and Taps:

If you have a shower, **clean the shower head regularly** (we recommend about once every 1–3 months). Over time, limescale and dirt can build up, which can encourage bacteria. You can clean a shower head by unscrewing it and soaking it in white vinegar or a mild bleach solution for a short time, then scrubbing off any scale and rinsing it well. If you are unable to do this yourself or are unsure how, please ask your support worker or contact Harbour Light – we can help arrange someone to do it if needed.

For taps, it also helps to wipe around the faucet where the water comes out. If your taps have an aerator (little mesh), you can unscrew and rinse those too. Keeping outlets clean improves water hygiene. In supported houses with staff, the staff will usually take care of this as part of their cleaning routine (you might have seen them do it).

4. Be Alert to Water Changes:

Pay attention to your water. **Report to us if you notice:**

- Water that is **discoloured** (brown, orange, or with particles) – this could mean sediment or rust, which we should check.
- **Strange smells** from the water (it should be essentially odourless; a slight chlorine smell is okay, but a musty or foul smell is not).
- **Very low pressure or flow** suddenly, which might indicate a problem in the system.
- Hot water that **isn't hot** or takes a very long time to get hot, or cold water that runs warm.
- **Unusual noise** from pipes when you use water (some noise can happen, but if it's a new loud banging or rattling, let us know).

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By telling us, we can investigate and fix any issues early. Remember, no issue is too small – your comfort and safety are important, and we want to ensure everything is working properly.

5. Preventing Legionella – What It Means for You:

Legionella bacteria can cause a serious pneumonia (Legionnaires' disease) if you inhale water droplets containing it. The risk in homes is **very low**, but we still take precautions. The good news is by following the tips above (running water regularly and cleaning shower heads), you're doing the key things needed to prevent it. Also:

- **Instant hot water systems:** Many of our homes have combi boilers or electric showers that heat water on the fly, which means water isn't stored and is less likely to have bacteria. If you do have a hot water tank, we ensure it stays hot to kill germs.
- We have done risk assessments and found our setups to be low risk, but we still want you to know how to maintain that low risk.

If you're curious, Harbour Light can share more about Legionella control – feel free to ask for the Water Safety Policy if you'd like the details.

6. Safety if You Help with Tasks:

Sometimes tenants like to be involved in maintaining their space. If you decide to flush an unused tap or clean a shower head yourself, just take basic care:

- When flushing hot water, be aware that it can get very hot – avoid splashing yourself. Maybe wear rubber gloves or use a cloth to handle very hot taps.
- Don't put your face right over a running shower – remember, inhaling mist is the risk, so let the shower run into the tub or drain without you close by initially.
- Ventilate the area if running a shower on hot for flushing; crack a window. This is just an extra precaution.
- If using any cleaner (like bleach or vinegar) for shower heads, follow the instructions and rinse things well afterwards. Keep the area well-ventilated. If you have any respiratory issues, it might be best to have someone else do the cleaning to avoid breathing any fumes.

7. What Harbour Light Does: *(for your reassurance)*

We want you to know that in the background, we:

- Service boilers and water heaters annually to keep hot water safe.
- Check water temperatures occasionally and always during safety inspections.
- Have our plumber test safety valves (TMVs) every couple of years where we've installed them.
- Remove old storage tanks and unused pipes from our systems over time, to modernise and reduce any risk.
- Flush the system out when a new person moves in (so you start with fresh water).
- Work with your support staff (if you have them on site) to make sure they do their part in cleaning and flushing.
- Conduct risk assessments, and if anything ever came up as a concern, we'd fix it.
- Keep records of what we do, and plan improvements.
- Respond quickly if you report a problem with your water.

So, while we ask you to do the simple things above, rest assured, we are taking care of the technical stuff.

8. If You Have a Problem or Concern:

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- **Repairs:** For issues like no hot water, leaking tanks, or similar, contact our Repair line immediately (the number is in your tenant handbook and on the notice board). This is usually treated as an urgent repair – hot water is essential for safe living.
- **Health concerns:** If you ever (very unlikely) were diagnosed by a doctor with something like Legionnaires' disease or even suspect your home's water made you ill, inform us *and* your Support Company at once. We will take it extremely seriously – getting professionals to check and clean the system and working with health authorities. Early reporting can prevent anyone else from getting sick.
- **General questions:** Not sure about something? Want us to check an outlet for you? Just ask. We can arrange for someone to pop in and have a look.

10. Remember:

Your cooperation helps keep everyone safe. By following these tips, you're helping ensure your water stays clean and healthy. If you live with others, everyone should be aware of this guidance – feel free to discuss it in house meetings or with support staff.

Harbour Light is committed to providing you a safe home. Water safety is a part of that commitment. Thank you for reading this and doing your part.

Stay safe and feel free to reach out with any concerns.

Harbour Light Assisted Living – Maintenance Team

(Please retain this sheet. Next review due by November 2028.)