

Legionella Safety Policy

1. Introduction

- 1.1. This policy describes how ReSI Homes will deliver its Legionella Safety responsibilities as a freeholder on any block with communal water storage assets, where ReSI Homes as the landlord has the responsibility to maintain.
- 1.2. ReSI Homes understands and accepts that by outsourcing delivery of these functions, it does not negate our legal responsibilities under the Health and Safety at Work Act 1974, COSHH Regulation 2002 and ACOP L8.

2. Scope

- 2.1. The policy applies to all ReSI Homes employees, tenants, Managing Agents, contractors and other persons or other stakeholders who may work on, occupy, visit, or use its premises, or who may be engaged or affected by its activities or services. This policy is applicable to all properties owned or managed by ReSI Homes that have communal water storage assets.
- 2.2. The policy is relevant for maintaining a safe environment for all customers within all ReSI Homes' communal blocks, where ReSI Homes has an obligation to do so.

3. Responsibilities

- 3.1. ReSI Homes may employ competent external contractors to carry out this work on its behalf, however, ReSI Homes will remain responsible for fulfilling Legionella Safety responsibilities for areas and properties that they are responsible for.
- 3.2. ReSI Homes will ensure that they will deliver its Legionella Safety responsibilities in:
 - all communal and shared areas for which ReSI Homes are responsible for.
 - all leasehold properties at the point of first tranche sale, repossession or buy back instances.

4. Policy Statement

- 4.1. ReSI Homes has a duty of care to ensure that residents and its staff, where relevant, can use the relevant buildings safely. This extends to mitigating the risks associated with Legionella and scalding.
- 4.2. Where hot and cold-water supplies within Shared Ownership or Leasehold homes are provided by communal facilities under the demise of ReSI Homes, the responsibility for the communal facilities remains with ReSI Homes. ReSI Homes is not however, responsible for the testing, maintenance of hot and cold-water systems contained within Shared Ownership and Leasehold properties. The responsibility is that of the homeowner. Where works by a homeowner will impact the communal systems ReSI Homes will verify the competence of those contractors.
- 4.3. For shared water tanks where responsibility water safety is the responsibility of another party, we will ensure that assessments are undertaken, and that compliance certificates .
- 4.4. ReSI Homes acknowledges and accepts our responsibilities under the Health and Safety at Work Act 1974 and the Control of Substances Hazardous to Health Regulations 2002 (as amended) in regard to the risk from Legionellosis.
- 4.5. ReSI Homes will take all reasonably practicable steps, including independent Quality Assurance to ensure all newly acquired properties have evidence in place to demonstrate that hot and cold-water systems designed and installed, meet the required standards and regulations in place at the time of installation.
- 4.6. ReSI Homes will ensure that there is a competent person and instruct a Water Risk Assessment (WRA) on all new communal blocks and applicable units, ensuring developers complete all actions before the properties are certified as 'Ready to Occupy (RTO)'.
- 4.7. The WRA will include:
 - Management responsibilities, including the name of the competent person carrying out the risk assessment
 - A description of the system, any potential risk sources, and any controls currently in place to control risks.

- Written scheme
 - Monitoring, inspection, and maintenance procedures
 - Records of the monitoring results, inspection and checks carried out and a review date.
- 4.8. Where the risks are assessed to be, insignificant and are being properly managed to comply with the law, no further action is required. ReSI Homes will periodically review these risk assessments (every 2 years) in case anything changes in the system.
- 4.9. ReSI Homes may deliver its water safety responsibilities and obligations for all units and blocks in management via a third-party Managing Agents. ReSI Homes will manage that relationship, seeking assurance, to ensure all required, risk assessment, inspection and maintenance is completed by competent persons, to meet the requirements of the obligations placed upon ReSI Homes.
- 4.10. ReSI Homes will require their Managing Agent(s) to follow the guidance contained within 'The control of Legionella bacteria in water systems: Approved Code of Practice (ACOP) (L8:2013) and provide evidence of this.
- 4.11. ReSI Homes will ensure a robust system of monitoring and measuring the performance of Managing Agent(s) in delivery of these functions is established and managed.
- 4.12. ReSI Homes will ensure that a robust regime of routine 'flushing' is in place for all void properties and throughout the duration when the properties are vacant. Records of the flushing will be stored against the unit on the ReSI Homes compliance system.
- 4.13. ReSI Homes will ensure compliance with water safety regulations and ACOPs, with performance formally reported at ReSI Homes Leadership Team level including the details of any non-compliance, and planned corrective actions.
- 4.14. ReSI Homes will ensure that written schemes of control in communal areas of buildings are available to inform occupants on how the risk of exposure to legionella bacteria is being managed and controlled.

- 4.15. ReSI Homes will ensure that our residents have access to water safety information that clearly explains the risks of legionella and scalding and their responsibilities, to support reducing those risks.
- 4.16. Where non-domestic or communal facilities provided for the use of ReSI Homes residents are not under ReSI Homes' demise, ReSI Homes will seek assurances from the third-party Duty Holders that effective water safety management measures are in place.

5. Legislation and Codes of Practice

- 5.1.).
- 5.2. Legislation - the principal legislation applicable to this policy is the Health and Safety at Work Act 1974 and the Control of Substances Hazardous to Health Regulations 2002 (as amended) (COSHH). ReSI Homes has a legal obligation under COSHH to prevent or control exposure to biological agents. Being harmful to human health, legionella falls within the scope of these regulations.
- 5.3. Code of Practice – the principal codes of practice applicable to this policy are:
- ACoP L8 - 'Legionnaires' disease: The control of legionella bacteria water systems' (4th edition 2013).
 - HSG274 - Legionnaires' disease: Technical guidance Part 2: The control of legionella bacteria in hot and cold-water systems (2014).
 - HSG274 - Legionnaires' disease: Technical guidance Part 3: The control of legionella bacteria in other risk systems (2013).
 - INDG458 - Legionnaires' disease: A guide for duty holders Leaflet (HSE Books 2012).

6. Additional Legislation

- 6.1. This water hygiene policy also operates in the context of the following legislation:
- Housing Act 2004
 - The Workplace (Health Safety & Welfare) Regulations 1992
 - Landlord and Tenant Act 1985
 - Building Regulations Part G Sanitation, Hot water safety & water efficiency

- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR)2013
- The Management of Health & Safety at Work Regulations 1999
- Construction, Design and Management Regulations 2015
- General Data Protection Regulations and Data Protection Act 2018
- The Water Supply (Water Fittings) Regulations 1999
- Minimising the risk of Legionnaires disease TM13. The Chartered Institute of Building Services Engineers 2013
- BS 8520-1:2019 Water Quality. Risk Assessments for Legionella Codes of Practice
- BS 8558:2015 Guide to the design, installation, testing and maintenance of services supplying water for domestic use within buildings and their curtilages.
- Pressure Equipment Regulations 1999
- Pressure Systems Safety Regulations 2000 Health and Safety at Work etc. Act, 1974
- Control of Substances Hazardous to Health Regulations 2002 (as amended)
- The Water Supply (Water Quality) Regulations 2000

7. Obligations

- 7.1. The Control of Substances Hazardous to Health Regulations 2002 (as amended) (COSHH), the Management of Health and Safety at Work Regulations 1999 and the Health and Safety at Work Act 1974 place a duty, as an employer or person in control of a premises (e.g. a landlord or Managing Agent), to take suitable precautions to prevent or control the risk of exposure to legionella bacteria.
- 7.2. Maintain an effective organisation structure outlining key roles and responsibilities for the management of water hygiene/safety.
- 7.3. Maintain an effective Governance Structure to effectively manage and report on water hygiene.
- 7.4. The 'Duty Holder' responsible for control of legionella and water hygiene safety will appoint a competent/responsible person to take managerial responsibility for legionella control – including risk assessment, production of a written scheme and implementation of that scheme to prevent or control the risks.

- 7.5. This 'Duty Holder' should also appoint a competent person or persons to take day-to-day responsibility for controlling any identified risks from legionella bacteria.
- 7.6. Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013 places duties on employers, the self-employed and people in control of work premises (the Responsible Person) to report certain serious workplace accidents, occupational diseases and specified dangerous occurrences (near misses). Legionnaire's disease is potentially notifiable under RIDDOR. And any potentially reportable incident will be considered by the Operations Director.

8. Quality Assurance and Audit

- 8.1. ReSI Homes will ensure that building safety audit of all communal blocks are carried out every quarter. This audit will specifically test for compliance with the Water Risk Assessment (WRA) and identify any non-compliance issues for correction.
- 8.2. The outcome of the building safety audits will be reported to Board, to provide further assurance on the safety of all our communal blocks.

9. Equality and Diversity

We are committed to make sure all services are accessible to all our residents. Our staff will be trained to communicate appropriately with you, and they have the relevant information and access to translation services to make sure they fully understand our you. This policy will be applied in a way which makes sure we treat all customers with fairness and respect. We recognise our duty to advance equality of opportunity and prevent discrimination or victimisation on the grounds of age, sex, sexual orientation, disability, race, religion or belief, gender re-assignment, pregnancy and maternity, marriage and civil partnership and any other protected characteristics defined within the Equality Act 2010.. On request we will provide translations of all our documents, policies and procedures in various languages and formats including braille and large print. Our website also has accessibility tools allowing you to personalise each web page to make it easier to read and to download content as audio

10. Policy Review

- 10.1. This policy will be reviewed as required or at least every two years to incorporate any changes in legislation or good practice.

24 November 2025