

Date Issued: 17/06/2026	Version: 3
Owner: Compliance & Building Safety	Next Scheduled Review: 17/06/2029

1. Purpose

- 1.1 This Policy outlines how Flint Housing will fulfil its statutory duties as required under current primary and secondary legislation and comply with the regulatory framework for social housing in England.
- 1.2 Flint Housing, as the duty-holder, has specific duties (amongst others) under the Control of Substances Hazardous to Health Regulations 2002 to:
- Carry out risk assessments and implement control measures; and
 - Control exposure to harmful substances.
- 1.3 Flint Housing aims to protect the occupiers of its properties, visitors, staff, contractors and the public from the risks associated with water hygiene so far as is reasonably practicable.
- 1.4 This Policy sets out key policy objectives, control measures and accountabilities to protect residents, staff, contractors and the public from harm.
- 1.5 For the purposes of this Policy, any reference to Flint Housing or “our” or “we” shall be relevant to all its associated entities and administered, where applicable, by its housing management provider(s).

2. Scope

- 2.1 This Policy applies to:
- All properties owned and managed by Flint Housing including properties being managed by third parties such as managing agents; and
 - Leasehold dwellings only as required to maintain safety of the block as a whole, where Flint Housing is the duty-holder.
 - Circumstances in which Flint Housing has a responsibility under the Tenant Satisfaction Measures (TSM) building safety measures to ensure all communal water tanks are monitored. Flint will obtain confirmation from the freeholder that these checks have been completed.
- 2.2 This Policy does not apply to:
- Cases where Flint Housing does not hold the landlord’s duty of care for communal systems; or
 - The servicing of supplies to Shared Owners (but we will periodically communicate with them to remind them of the importance of undertaking these checks and consider water safety when their property is vacant).

3. Legislation and guidance

- 3.1 This Policy will ensure Flint Housing’s compliance with, but not limited to, the following legislation:
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- Control of Substances Hazardous to Health Regulations 2002
- Health and Safety at Work etc. Act, 1974
- Management of Health and Safety at Work Regulations 1999
- Housing Act 2004
- HHSRS – Housing Health and Safety Rating System

4. Monitoring & quality control

4.1 We will monitor the implementation of this Policy using the following performance measures:

Measure	Target	Reviewed by / interval
No. of blocks with current LRA (Legionella Risk Assessment) on file of those required by the PRA (Portfolio Risk Assessment)	100%	<u>Monthly</u> <ul style="list-style-type: none"> • Compliance & Building Safety Team
No. of active & overdue actions	Zero	
No. of active actions	No target	<u>Quarterly</u> <ul style="list-style-type: none"> • Board of Directors
Monitoring & sampling regimes completed on target	100%	

4.2 Flint Housing's housing management provider(s) will be required to maintain the above KPI targets as part of the housing management services provided.

4.3 Housing management providers will submit monthly reports to Flint Housing's Compliance & Building Safety team for ongoing review and periodic discussion by the Flint Housing board of directors, at least twice a year, showing performance against targets and explaining any variance from the agreed service delivery standards.

5. Policy implementation & responsibilities

5.1 Flint Housing's Compliance & Building Safety team retains overall accountability for the policy. Flint Housing is the duty-holder.

5.2 The Compliance & Building Safety team is responsible for:

- Monitoring the consistent implementation of this Policy and ensuring adequate resources are made available to meet the policy objectives;
- The delivery of the key policy objectives and for achieving the associated targets;
- Overseeing the operational delivery of this policy, including through housing management agreements entered into by Flint Housing, including:
 - ensuring delivery of inspection and monitoring and resolution of remedial actions; and
 - where appropriate, for ensuring systems are in place for flushing of systems.
- Monitoring performance of housing managers against this Policy; and

- Ensuring the policy is reviewed and updated in line with legislation.
- 5.3 Flint Housing's housing management provider(s) will be responsible for the implementation of this Policy within the housing management services provided to Flint Housing and commissioning the required Legionnaire Risk Assessments and implementing recommendations within such surveys as part of the repairs and maintenance programme, subject to required sign-offs from Flint Housing's Compliance & Building Safety team.
- 5.4 The relevant housing management provider(s) will oversee and manage contractors undertaking required repair and maintenance works.

6. Objectives

- 6.1 Flint Housing will:
- Appoint a suitably competent risk assessor to carry out a risk assessment across the portfolio (the Portfolio Risk Assessment - PRA) to ensure the water management programme is successfully carried out and identify Legionnaires' disease and where conditions may be present that encourage legionella bacteria to multiply and/or disperse beyond a tolerable level;
 - Buildings with a rating higher than tolerable will be initially flagged as needing an initial Legionella Risk Assessment (LRA);
 - For each identified block complete a Legionella Risk Assessment (LRA). The LRA will identify the need, if relevant, for a Written Scheme of Control (WSC) for legionella identifying activities to reduce risk from legionella and other hazards;
 - Use the outcomes from the LRAs to arrange programmes of routine monitoring and sampling of water systems, including, where needed, a programme of modification to any deficient systems and equipment;
 - Carry out an inspection of the water storage and distribution system in vacant properties and resolve any issues. The water system will be flushed through all outlets for at least 5 minutes, not more than 7 days prior to occupation. Flint Housing will also put in place an appropriate regime to ensure the risk of legionella is controlled in long term voids/vacant new properties;
 - Maintain a comprehensive monitoring and repair service to deal with water hygiene management related issues;
 - Ensure that dwellings with unvented hot water cylinders are inspected and serviced annually in line with British Standards and manufacturer's requirements;
 - Keep and maintain a detailed electronic register (the LRA register) listing:
 - Blocks where LRAs are required;
 - The date of the last LRA; and
 - List of issues experienced and remedial actions taken.
 - Carry out a property asset data review at least once a year to provide assurance that water safety information held against all properties is accurate; and
 - Only appoint contractors to undertake LRAs and remedial actions who are qualified to do so.
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7. Legionella Management Plan

7.1 Flint Housing will implement this Policy by way of a Legionella Management Plan and routinely carry out training with staff and contractors to ensure its requirements are understood.

7.2 The Legionella Management Plan will cover the following areas of management, amongst others:

- Allocation of specific roles and responsibilities to staff and contractors
- LRA and Action Processing
- Routine monitoring and sampling
- Action quality control
- Customer communication
- Gaining access for essential works (as per the Access Policy)
- Training requirements

8. Risk Assessments (PRA & LRAs)

8.1 Flint Housing will:

- Undertake a LRA for all new built properties prior to occupations and complete all identified actions before the property is occupied.
- Undertake a LRA for all properties with shared water supplies at least every 2 years or where there has been a significant change in circumstances affecting the property.
- Complete a review using the criteria shown in the table below to establish if an LRA is required.

LRA required (Blocks)	LRA may be required (either complete initial LRA or carry out survey)	LRA not required (Category B)
Offices Communal heating present Known to have shared water systems	All other blocks to establish if shared water system is present (between dwellings)	Definitively established that no shared water systems present (between dwellings)

8.2 LRAs shall be reviewed in the following circumstances:

- When works affecting a shared water system have been completed e.g. shared tank to mains fed.
- When vulnerability profile of the residents (for the entire block) changes significantly e.g. change to older persons.
- On receipt of new information about risks or control measures.
- If a case of suspected/Legionnaires Disease is associated with the block.

8.3 Flint Housing will programme and commission LRAs from suitably qualified and accredited Contractors.

8.4 LRAs will be completed in accordance with guidance document HSG274 and BS8580-1:2019.

9. Actions

- 9.1 LRAs describe actions that are required to be undertaken to remove or mitigate risks.
- 9.2 Flint Housing will schedule and subsequently resolve actions through to resolution to reduce risk to a tolerable level. We will resolve any emergency actions (or mitigate the risk) immediately.
- 9.3 The risk assessor will allocate actions with a risk rating, and a target time to resolve, in line with the table set out below:

Priority Description	Resolution Time
Emergency	24 hours
Very High	7 days
High	90 days
Medium	183 days
Low	365 days

- 9.4 Action resolution times will be measured from the date the Risk Assessment is completed at site.

10. Inspection and monitoring

- 10.1 LRAs require a range of activities (in addition to actions) which will be completed and logged as set out below (regimes vary depending on the assets/risk level):

Frequency	Activity	By	Logged to
Weekly	Flushing of outlets in void and unoccupied properties	Housing management provider / contractor	Housing management provider database
Monthly	Temperature checks of calorifier flow and return, sentinel and communal outlets		
Quarterly	Clean, descale and sterilise shower heads (communal)		
Half yearly	CWST Temperature check		
Annually	Sampling hot water calorifiers, TMV Servicing, Visual Inspection on Cold Water Storage Tanks Representative check of dwellings (in block) tap temperatures on rotational basis		

11. Customer communication

- 11.1 Advice on water hygiene will be made available to customers via the housing management provider(s).
- 11.2 Flint Housing will periodically provide residents with water safety information via our website, newsletters, and leaflets.

12. Access

- 12.1 Insofar as it is applicable, Flint Housing shall fully comply with its housing management provider's Access Policy in relation to carrying out its water safety obligations.
- 12.2 It is an explicit condition of the tenancy agreement that tenants are required to grant access to the premises for the purpose of safety checks and maintenance work, and Flint Housing has a legal duty to ensure that all reasonable steps are taken (as per the Access Policy) to secure access to each property for these to be carried out, which will include, as a minimum (via our contractors, housing management provider's or otherwise):
- 12.3 We will make three attempts to contact you. This may include contacting your next of kin or other household members (anyone listed on your tenancy file).
- 12.4 Following three unsuccessful attempts to gain access to a tenant's accommodation, where all other efforts have failed, it will be necessary to move to legal processes available within the Housing Act and the tenancy contract to gain access in order to complete the inspection. Tenants may be liable for costs associated with commencing the legal process.
- 12.5 Flint Housing will act appropriately, in accordance with legal requirements and the Access Policy in gaining access to properties. We will take into account any special needs, or vulnerability issues, before initiating legal action against a resident.

13. Equality and diversity

- 13.1 Flint Housing is committed to making sure all services are accessible to all our residents. Our staff will be trained to make sure they are communicating appropriately with our customers, and they have the relevant information.
- 13.2 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 characteristic defined within the Equality Act 2010.
- 13.3 On request we will provide translations of our documents, policies and procedures in various languages and formats including braille and large print, where a request in respect of each individual item is demonstrably reasonable (and not, for example, vexatious).

14. Review

- 14.1 This policy will be reviewed in conjunction with our housing management provider partners to address legislative, regulatory, best practice or operational issues at least every three years, or more frequently where:
 - Legislation/regulation or industry changes require otherwise, making sure that it continues to meet our aims and industry best practice; and /or
 - We identify any problems or failures in this procedure as a result of customer and stakeholder feedback, complaints, or findings from any independent organisations; and/or
 - We become aware of any other circumstances which may affect the content of this Policy.
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