

IronOak Homes



IRON OAK

WATER SAFETY POLICY

Control Sheet

Version number	01
Date approved by Board	24 July 2026
Date of next review	June 2029
Status	Published
Policy owner	Head of Operations
Policy location	IronOak Shared Drive
Target group	Employees

Document History:			
Version	Date of review	Author	Note of revisions
01	July 2026	Head of Operations	New Policy

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1. Introduction

- 1.1. IronOak Homes ("IronOak") is committed to ensuring that all water systems within properties under its ownership, management or control are safe, properly maintained and managed in a manner that protects residents, employees, contractors, visitors and members of the public from risks associated with water systems, including Legionella bacteria and water quality failures.
- 1.2. IronOak will take all reasonably practicable measures to identify, assess, manage and monitor risks associated with water systems and will maintain effective arrangements to prevent exposure to waterborne hazards.
- 1.3. The organisation recognises its responsibilities as a landlord, employer and responsible person and will maintain a risk-based water safety management system that supports compliance with applicable legislation, regulatory standards and industry good practice.

2. Purpose

- 2.1. The purpose of this policy is to:
 - Protect the health and safety of residents, employees, contractors and visitors.
 - Ensure effective management of water hygiene and Legionella risks.
 - Define organisational responsibilities for water safety.
 - Establish governance, assurance and reporting arrangements.
 - Support compliance with applicable legal and regulatory requirements.
 - Provide a framework for monitoring, inspection, maintenance and continuous improvement.

3. Scope

- 3.1. This policy applies to all properties and premises owned, leased, managed or controlled by IronOak including:

3.1.1. Tenure Types

- Social housing
- Non-social housing
- Temporary accommodation
- Leased and managed accommodation
- Commissioned accommodation

3.1.2. Property Types

- General needs housing
- Single occupancy dwellings
- Houses in Multiple Occupation (HMOs)
- Supported living schemes
- Specialised supported housing
- Offices and communal facilities
- Buildings with shared or communal water systems

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3.1.3. Persons Covered

This policy applies to:

- Residents
- Employees
- Contractors
- Visitors
- Managing agents
- Care and support providers operating within IronOak-managed premises

4. Legal and Regulatory Framework

4.1. IronOak will comply with all relevant legislation relating to water safety, including but not limited to:

- 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)
 - Housing Act 2004
 - Landlord and Tenant Act 1985
 - Homes (Fitness for Human Habitation) Act 2018
 - Building Safety Act 2022 (where applicable)
 - Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) where relevant
 - ACOP L8 – The Control of Legionella Bacteria in Water Systems
 - HSG274 Parts 1, 2 and 3
 - Regulator of Social Housing Safety and Quality Standard
 - Any successor legislation, statutory guidance or regulatory requirements.
- Where legislative requirements change, IronOak will review this policy and associated procedures accordingly.

5. Policy Principles

5.1. IronOak adopts a proportionate risk-based approach recognising that:

- Most domestic water systems present low risk when properly maintained.
- The level of control required should reflect the level of risk.
- Vulnerable residents may require additional safeguards.
- Risk management should be evidence-based and regularly reviewed.

The organisation's core principles are:

- Keep hot water hot.
- Keep cold water cold.
- Keep water moving.
- Remove unnecessary dead legs and redundant pipework.
- Maintain clean and safe water systems.
- Monitor and review compliance performance effectively.

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6. Governance and Accountability

6.1. Board

6.1.1. The Board is responsible for:

- Receiving assurance that water safety risks are effectively managed.
- Monitoring organisational compliance.
- Reviewing significant compliance failures and incidents.
- Receiving annual water safety assurance reports.

6.2. Chief Executive

6.2.1. The Chief Executive retains overall accountability for ensuring adequate resources and governance arrangements are in place.

6.3. Duty Holder

6.3.1. The Head of Operations is designated as the Duty Holder and is responsible for:

- Implementing this policy.
- Ensuring risk assessments are completed.
- Maintaining compliance arrangements.
- Monitoring contractor performance.
- Reporting compliance performance to Executive Leadership Team and Board.

6.4. Competent Person

6.4.1. IronOak shall appoint one or more Competent Persons responsible for:

- Day-to-day management of water safety compliance.
- Monitoring contractor activities.
- Maintaining records.
- Managing remedial actions.
- Escalating risks appropriately.

6.5. Managing Agents

6.5.1. Where responsibilities are delegated to managing agents:

- Legal accountability remains with IronOak.
- Managing agents must comply with this policy.
- Performance will be routinely monitored and audited.
- Compliance evidence must be provided on request.

6.6. Contractors

6.6.1. Contractors undertaking water safety work must demonstrate:

- Appropriate competence and experience.
- Relevant qualifications and training.
- Suitable professional accreditations.
- Adequate insurance arrangements.
- Membership of recognised industry schemes, including LCA accreditation where appropriate, will be considered as evidence of competence

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6.7. Residents

6.7.1. Residents are expected to:

- Provide reasonable access.
- Report water system concerns.
- Follow water safety guidance issued by IronOak.
- Notify IronOak of extended absences where appropriate.

7. Water Safety Management System

7.1. IronOak will maintain documented arrangements for:

- Risk assessment.
- Monitoring and inspection.
- Maintenance and repair.
- Remedial works.
- Record keeping.
- Incident management.
- Contractor management.
- Resident communication.

For higher-risk or more complex systems, IronOak will maintain formal Water Safety Plans detailing:

- System descriptions.
- Risk controls.
- Monitoring requirements.
- Escalation procedures.
- Responsible persons.

Water Safety Plans will be implemented for:

- Specialised supported housing.
- Complex communal systems.
- Buildings with water storage.
- Higher-risk HMOs.
- Any premises identified through risk assessment as requiring enhanced controls.

8. Risk Assessment

8.1. General Requirements

8.1.1. IronOak will ensure all water systems are subject to suitable and sufficient risk assessment.

8.1.2. Risk assessments will:

- Identify hazards and controls.
- Be undertaken by competent persons.
- Be documented and retained.
- Result in actionable recommendations where required.

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8.2. Review Requirements

8.2.1. Risk assessments will be reviewed:

- At intervals determined by the assessed risk level.
 - Following significant alterations.
 - Following changes in occupancy or use.
 - Following significant incidents.
 - When there is reason to believe the assessment is no longer valid.
 - Following changes in legislation or guidance.
- Higher-risk premises may require more frequent review than lower-risk domestic properties.

9. Property-Specific Requirements

9.1. Single Domestic Dwellings

9.1.1. Typical risk level: Low.

9.1.2. Controls may include:

- Domestic legionella risk assessments.
 - Resident information.
 - Water temperature management.
 - Targeted intervention where risks are identified.
- Routine sampling is not generally required unless justified by risk assessment.

9.2. Houses in Multiple Occupation

9.2.1. Controls include:

- Enhanced risk assessment.
- Flushing of infrequently used outlets.
- Monitoring of communal systems.
- Clear management responsibilities.
- Additional inspections where required.

9.3. Supported Living

9.3.1. Controls include:

- Increased monitoring arrangements.
- Staff-supported flushing regimes where necessary.
- Defined responsibilities between housing and care providers.
- Enhanced oversight of vulnerable residents.

9.4. Specialised Supported Housing

9.4.1. Controls include:

- Formal Water Safety Plans.
- Enhanced monitoring.
- Additional inspections.

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- Appropriate temperature controls.
- Close coordination with care providers.
- Additional sampling where justified through risk assessment.

10. Vulnerable Persons and Special Risks

10.1. Additional consideration shall be given where residents are:

- Elderly
- Immunocompromised
- Living with long-term health conditions
- Children or young people
- Receiving care or support services

10.2. Control measures may include:

- Increased inspection frequencies.
- Enhanced management oversight.
- Additional communication and support.
- Reduced tolerance for overdue compliance actions.

11. Void and Vacant Properties

11.1. IronOak will maintain arrangements for managing water safety risks in void properties.

11.2. Controls may include:

- Regular flushing.
- System drainage where appropriate.
- Pre-let inspections.
- Recommissioning procedures.
- Risk reassessment before occupation.

12. Monitoring and Control Measures

12.1. The organisation will implement controls appropriate to the system and identified risks, including:

- Temperature monitoring.
- Inspection of water storage facilities.
- Flushing regimes.
- Removal of redundant pipework.
- Maintenance of water systems.
- Corrective repairs.
- Water quality monitoring where required.

Monitoring frequencies shall be defined within operational procedures and risk assessments.

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13. Contractor Management

13.1. IronOak will operate a contractor management framework which includes:

- Pre-qualification assessments.
- Competency verification.
- Performance monitoring.
- Review of inspection reports.
- Audit of completed works.
- Escalation of poor performance.

Contractor performance will be periodically reviewed and reported through compliance governance arrangements.

14. Non-Compliance and Escalation

14.1. Any significant water safety failure shall be managed through IronOak's risk management framework.

14.2. Examples include:

- High-risk risk assessment findings.
- Failed temperature monitoring.
- Overdue remedial actions.
- Legionella detection requiring intervention.
- Persistent access refusal.
- Contractor failures.

14.3. Escalation arrangements shall include:

- Risk assessment of the issue.
- Immediate control measures where necessary.
- Senior management notification.
- Resident communication where appropriate.
- Board reporting for significant incidents.
- Regulatory reporting where legally required.

15. Records and Documentation

15.1. IronOak shall maintain accurate water safety records including:

- Risk assessments.
- Monitoring records.
- Inspection reports.
- Maintenance records.
- Sampling results.
- Remedial action records.
- Contractor competence records.
- Incident investigations.

15.2. Records shall be retained in accordance with IronOak's Record Retention Schedule and for no less than any period required by legislation, regulatory requirements or recognised industry guidance.

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16. Training and Competence

16.1. IronOak will ensure individuals responsible for water safety:

- Receive appropriate training.
- Maintain competence relevant to their role.
- Receive refresher training where required.
- Understand their responsibilities under this policy.

Training records shall be maintained.

17. Resident Communication

17.1. Residents will receive appropriate water safety information including:

- Reporting arrangements.
- Advice on maintaining domestic outlets.
- Guidance on cleaning shower heads.
- Advice following periods of prolonged absence.
- Information at sign-up and tenancy commencement.

Where significant risks are identified, tailored communication will be provided.

18. Performance Monitoring and Assurance

18.1. IronOak shall monitor compliance through key performance indicators including:

- Risk assessments completed on time.
- Monitoring activities completed.
- Remedial actions closed within target timescales.
- Overdue actions.
- Audit findings.
- Contractor performance.

18.2. Performance reports shall be presented:

- Quarterly to the Executive Leadership Team.
- Quarterly to the Board through compliance reporting.
- Annually through a Water Safety Assurance Report.

18.3. Internal audits may be undertaken to verify compliance.

19. Continuous Improvement

19.1. IronOak is committed to continuous improvement and will:

- Monitor legislative and regulatory developments.
- Review incidents and lessons learned.
- Undertake periodic audits.
- Benchmark performance against sector good practice.
- Update procedures and controls where required.

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20. Policy Review

20.1. This policy shall be reviewed:

- Every three years; or
- Earlier where there is a significant change in legislation, regulation, organisational structure, stock profile, risk profile or industry guidance.