



Water Management Policy

Approval date: October 2019
Review date: October 2022

This policy applies to

- Link Group
- Link Housing
- Link Living
- Link Property
- Horizon
- Larkfield
- West Highland
- Lintel Trust

Policy Summary

The purpose of this policy is to provide a clear unambiguous statement of the organisation’s procedure on water management, Legionella control and prevention for the buildings owned and managed by Link Group Ltd [Link].

Equalities

The operation of this policy will be delivered in accordance with Link Group’s Equality, Diversity and Inclusion. During the production of this policy, no issues were raised which would conflict with the Equality, Diversity and Inclusion Policy

Privacy

It was identified during the production of this policy that incident reporting regulations may require personal data to be gathered and stored. All information collected will therefore be managed in accordance with Link Group’s Data Protection Policy.

Policy Owner
 Director of Human
 Resources and Business
 Support

Review Manager

Approved By
 Senior Management
 Group

Revision History		
Date	Version Number	Comments

1. INTRODUCTION

The risk of Legionella must be proactively managed by Link. The management arrangements are essential to ensure that the risks are appropriately minimised.

The purpose of this document is to provide a clear unambiguous statement of the organisation's policy on Legionella control and prevention for the buildings owned and managed by Link.

2. PRINCIPLES

The following principles govern the operation of this policy:

- be clear and understood by all employees
- be fair, equitable and non-discriminatory
- reflect the needs of Link's diverse organisation
- reflect statutory requirements and best practice
- be flexible and adaptable to changing needs

3. OBJECTIVES

The objectives of this policy are to ensure:

- all Legionella risks have been identified and assessed
- a monitoring programme is in place to reduce the risk of a Legionella outbreak
- that identified risks are removed where possible or that they are mitigated where it is not possible to remove them entirely
- all Legionella outbreaks are reported within specified timescales as required by the Reporting of Injuries Diseases and Dangerous Occurrence Regulations 1995 (RIDDOR)
- all staff and tenants are made aware of Legionella risks and control measures
- the Senior Management Group [SMG] is informed of shortfalls and actions taken
- the effectiveness of introduced control measures is monitored

4. APPROACH AND METHOD

The Senior Management Group [SMG] in its formal approval of the policy acknowledges that it accepts full responsibility for its implementation. Day-to-day responsibility for the operation of this policy lies with the appropriate directors and managers of the Link group of companies. All relevant employees have a responsibility to ensure that this policy is applied as instructed.

This policy will be implemented using the following approaches:

- devising a written scheme and procedures for compliance with the policy
- keeping employees informed of the policy requirements and any subsequent amendments.

- monitoring adherence to policy requirements

The Water Management Policy focuses on identifying all Legionella risks, ensuring that:

- they are identified and assessed
- they are removed or included in a monitoring programme
- a timely investigation undertaken following outbreak of Legionellosis
- agreed actions are taken to prevent re-occurrence

This policy ensures that management and staff are informed of all safety related unplanned events and actions taken. Monitoring of introduced controls will be undertaken and where appropriate, established control measures will be reviewed to ensure they are relevant and adequate.

5. MONITORING, PERFORMANCE MEASUREMENT AND REPORTING

The following areas will be subject to monitoring:

- Risk management
- Provision of training and/ or information to staff
- Compliance with policy requirements and procedures

These will be monitored by appropriate managers within each company and/ or function, and reported to the relevant director. If any significant issues of concern arise, these will be dealt with by the director who will report such matters to his/ her Board. The progress and performance of the Water Management contract will be reported to the Link Group Board on a quarterly basis.

Any matter which demonstrates a serious failure of internal controls should also be reported immediately to the Director of Development and Asset Management.

6. COMPLAINTS AND APPEALS

Link Group welcomes complaints and positive feedback, both of which provide information which helps us to improve our services. We use a complaints handling procedure (CHP) developed by the Scottish Public Services Ombudsman (SPSO) and the Scottish Housing Regulator.

The CHP allows for most complaints to be resolved by front line staff within a five day limit (first stage), or if the complaint is complex, a detailed investigation will be made by a manager within a 20 day limit (second stage). At the end of the second stage our response will be made by a director. If the customer remains dissatisfied he/ she may then refer the matter to the SPSO.

The SPSO does not normally review complaints about our factoring service. If a factoring customer is dissatisfied after using the CHP, the complaint may be referred to the Homeowner Housing Panel.

Anyone receiving care or support service from us has the right to complain either direct to the Care Inspectorate or to us.

At each stage Link Group will advise the customer how the complaint should be taken forward, and advise which agency would be most appropriate to consider the case.

7. POLICY AVAILABILITY

This policy is available on request free of charge from Link Group. A summary of this policy can be made available in a number of other languages and formats on request.

8. POLICY REVIEW

Link Group undertake to review this policy regularly, at least every three years, with regard to:

- Applicable legislation, rules, regulations and guidance
- Changes in the organisation
- Continued best practice

Privacy Impact Assessment Screening Questions

Carrying out a Privacy Impact Assessment [PIA] will be useful to any project – large or small – that:

- Involves personal or sensitive data about individuals
- May affect our customers' reasonable expectations relating to privacy
- Involves information that may be used to identify or target individuals

Please tick the applicable statement(s) below. Will your project involve:

1. A substantial change to an existing policy, process or system that involves personal information Yes No
2. A new collection of personal information Yes No
3. A new way of collecting personal information (for example collecting it online) Yes No
4. A change in the way personal information is stored or secured Yes No
5. A change to how sensitive information is managed Yes No
6. Transferring personal information outside the EEA or using a third-party contractor Yes No
7. A decision to keep personal information for longer than you have previously Yes No
8. A new use or disclosure of personal information you already hold Yes No
9. A change of policy that results in people having less access to information you hold about them Yes No
10. Surveillance, tracking or monitoring of movements, behaviour or communications Yes No
11. Changes to your premises involving private spaces where clients or customers may disclose their personal information (reception areas, for example) Yes No

If you have answered 'Yes' to any of these points, please complete a full Privacy Impact Assessment. If you have answered 'No', you need take no further action in completing a Privacy Impact Assessment.

Equality Impact Assessment Screening Questions

Will the implementation of this policy have an impact on any of the following protected characteristics?

- | | | |
|-----------------------------------|------------------------------|--|
| 1. Age | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 2. Disability | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 3. Gender reassignment | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 4. Marriage and Civil Partnership | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 5. Pregnancy and Maternity | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 6. Race | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 7. Religion or belief | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 8. Sex | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 9. Sexual orientation | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |

If you have answered 'Yes' to any of these points, please complete a full Equality Impact Assessment. If you have answered 'No', you need take no further action in completing an Equality Impact Assessment.