

Water Hygiene Policy

1.0	SCOPE
	Purpose
1.1.	whg recognises that it has a duty to protect colleagues, customers, visitors and the general public who may come into contact with the water systems it manages. This policy sets out whg's commitment to ensuring sufficient systems are in place to prevent an outbreak of legionnaire's disease and to ensure compliance with relevant legislation.
1.2.	Legionella bacteria is widespread in natural sources of water and often enters manufactured water systems where it proliferates in temperatures between 25°C and 45°C. Exposure to the bacteria can lead to Legionnaires' disease which can prove fatal, particularly among those already vulnerable due to illness or age. Nevertheless, this outcome is avoidable where adequate measures have been put in place and followed.
	Legal and regulatory framework
1.3.	<p>The fourth edition Approved Code of Practice (ACOP) hsg274 (L8) gives advice on the requirements of the Health and Safety at Work Act 1974 (the HAW Act) and the Control of Substances Hazardous to Health Regulations 2002 (COSHH) and applies to the risk of exposure to legionella bacteria (the causative agent of legionellosis, including Legionnaires' disease). The Code also gives guidance on compliance with the relevant parts of the Management of Health and Safety at Work Regulations 1999 (the Management Regulations). To comply with the legal duties, whg will:</p> <ul style="list-style-type: none"> • Identify and assess sources of risk. Including identification of higher risk property types such as high rise blocks, office accommodation, community rooms and well-being schemes. This includes checking whether conditions will encourage bacteria to multiply. • If appropriate, prepare a written scheme for preventing or controlling the risk. • Implement, manage and monitor precautions – if control measures are to remain effective, regular monitoring of the systems and control measures is essential. • Keep records of the precautions. • Appoint a competent person with sufficient authority and knowledge of the installation to help take measures needed to comply with the law.

1.4.	<p>whg will adhere to Consumer Standards 2024 and specifically the Safety and Quality Standard</p> <ul style="list-style-type: none"> 2.2.1 Registered providers must identify and meet all legal requirements that relate to the health and safety of tenants in their homes and communal areas. 2.2.2 Registered providers must ensure that all required actions arising from legally required health and safety assessments are carried out within appropriate timescales.
2.0	POLICY STATEMENT
2.1.	<p>whg has an obligation under the Health and Safety at Work Act 1974 to show a duty of care towards colleagues and customers. This includes protecting these groups from exposure to legionella bacteria. In addition, guidance Document L8 produced under the Control of Substances Hazardous to Health Regulations 2002 states that landlords must produce a risk assessment to control the risk posed by biological agents such as legionella.</p>
2.2.	<p>Managing legionella bacteria will be the responsibility of the Chief Executive at a strategic level and the Head of Compliance at an operational level, with support from a Specialist. Any colleagues appointed to undertake control measures will be suitably trained and Specialists must be Health and Safety Executive Code of Conduct Approved.</p>
2.3.	<p>Sufficient resources will be made available to ensure that water storage and distribution systems are operated and maintained in accordance with current legislation and guidance.</p>
	Assessing Risk
2.4.	<p>whg shall take all steps to ensure the risk of legionella proliferation and contamination is minimised. We will:</p> <ul style="list-style-type: none"> Periodically risk assess whg's water systems, identifying any sources posing risk, as well as delegating responsibility for management. Ensure that a full inspection of the water system is performed annually by an independent auditor and that these results are recorded. Six monthly total viable count (TVC) water samples to be taken to confirm the absence of legionella and any other bacterial yeast or moulds. Undertake monthly temperature checks of whg's water systems as set out in the Legionella procedure. Manage the risks during non-occupancy, consideration is given to implementing a suitable flushing regime or other measures such as draining the system if it is to remain vacant for long periods. Void properties are drained at the point of vacation and flushed on occupation.

	<p>hsg274 part 2, section 2.141 states;</p> <p>For most residential settings, the risk assessment may show the risks are low, in which case no further action may be necessary, e.g. housing units with small domestic-type water systems where water turnover is high. If the assessment shows the risks are insignificant and are being properly managed to comply with the law, no further action may be required, but it is important to review the assessment periodically in case anything changes in the system. However, the frequency of inspection and maintenance will depend on the system and the and the risks it presents.</p>
	Preventing and Managing Risk
2.5.	<p>whg will also put measures in place to prevent and manage the risk of proliferation and contamination. We will:</p> <ul style="list-style-type: none"> • Keep records of the precautions implemented and do so for each of the premises under our control. • Annual audit reports to ensure compliance will be produced for each site to be reviewed by the Responsible Person, Control Team and Specialist. • Follow up actions identified by the specialist contractor will be monitored via their client online report tracker (ORT). • Provide regular training for colleagues involved in controlling legionella to ensure that knowledge is appropriate and in line with current legislation and guidelines.
2.6.	<p>The fourth edition ACOP hsg274 (L8) identifies two distinct roles, each having specific responsibilities for the management of legionella bacteria, namely:</p> <ol style="list-style-type: none"> a. The Duty Holder b. The Responsible Person
	The Duty Holder: Chief Executive
2.7.	<p>The duty holder must appoint in writing a responsible person to take managerial responsibility for controlling legionella in whg premises and must ensure that whg meets its statutory obligations. The Chief Executive is ultimately responsible for Health and Safety and the safe operation of the water systems within whg premises.</p>
	The Responsible Person: Head of Compliance
2.8.	<p>The responsible person shall accept managerial responsibility for the control of legionella bacteria within all whg premises. They will be responsible for the implementation and management of the Legionella Control Plan and all the procedures for control as set out in this policy and the Water Hygiene Procedure Manual. It is important for the appointed responsible person to have</p>

	sufficient authority, competence and knowledge of the installation to ensure that all operational procedures are carried out effectively and in a timely way.
2.9.	Where a colleague contracts Legionnaire's disease following working on whg's water systems these should be reported to the Responsible Person who will be responsible for notifying the Health and Safety Executive. <ul style="list-style-type: none"> It is also the responsibility of customers to minimise the risk of an outbreak of legionella in their properties. Informing whg of any repairs required to their water system. Maintaining basic hygiene practices around water outlets.
3.0	PERFORMANCE MEASURES
3.1.	whg has a duty under the Health and Safety at Work Act 1974 as an employer, provider of premises used by non-employees and landlord regarding health and safety in connection with its undertaking.
3.2.	In particular we will ensure that we have an appropriate regime for the design, installation and maintenance of water supply systems on its premises. whg also recognise our responsibility to implement, in full the codes of practice as defined in the Health and Safety Executive's publication "Legionnaires' Disease the control of legionella bacteria in water systems" (Approved Code of Practice) (hsg274) (L8).
3.3.	To comply with these regulations, we will make a systematic assessment of risks to health and safety for our colleagues and others, arising from activities. These include: <ol style="list-style-type: none"> Identifying and assessing sources of risk, taking into account, building type, size, use and the vulnerability of the users amongst other considerations. If required, preparing a scheme for preventing or controlling the risk Implementing and managing any identified, precautions. Implementing a safe system of working. Keeping records of any precautions implemented and doing so for each of the required premises under whg's control. The risk assessments will be carried out regularly, in line with hsg274. This will be measured by a power bi report.
4.0	EQUALITY AND DIVERSITY
4.1.	Water Hygiene risk assessments consider the needs of all occupants and are designed to ensure people are not treated differently or discriminated against because of their characteristics.
5.0	TRAINING AND DISSEMINATION

5.1.	Our Specialist Contractors are members of the Legionella Control Association and can provide support and guidance where necessary.
6.0	MONITOR AND REVIEW
6.1	This Policy will be monitored by the Director of Building Safety and Compliance and reviewed every three years by the Policy Group.
7.0	ASSOCIATED DOCUMENTS, POLICIES AND PROCEDURES
7.1	Documents, policies and procedures associated with this policy are: <ul style="list-style-type: none">• Health and Safety at Work Act 1974• Control of Substances Hazardous to Health Regulations 1999• Management of Health and Safety at Work Regulations 1999• Approved Code of Practice (L8) legal guide and HSG274 supporting technical guidance

Document author	Head of Compliance – Building Safety
Document owner	Director Building Safety & Compliance
Legal advice	No
Consultation	Yes Customer Editorial Group Section 2.4 Hsg274 part 2, section 2.141
Approved by	Policy Group December 2024
Review Date	December 2027
Equality Assessment	Not required
Key changes made	Updates made to: <ul style="list-style-type: none"> • Responsible Person changed from Home Maintenance Project Manager to Head of Compliance • Section 1.4 – Legal & Regulatory Framework • Section 2.4 – Assessing Risk