

Water Hygiene Policy

1.	INTRODUCTION
	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 managing water hygiene risks, preventing exposure to Legionella bacteria so far as is reasonably practicable and ensuring compliance with relevant legislation.
1.2	Legionella bacteria are 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.
	Scope
1.3	This policy applies to all the water systems managed by whg, including those in our premises and whg owned and managed homes.
	Legal and regulatory framework
1.4	The following laws apply to this policy: • Health and Safety at Work etc. Act 1974 is the overarching health and safety legislation and requires employers, including landlords and organisations responsible for premises, to protect employees, customers, contractors, visitors and others who may be affected by their activities. In the context of water hygiene; the Act requires all reasonably practicable steps be taken to prevent exposure to risks arising from water systems, including Legionella bacteria. • Management of Health and Safety at Work Regulations 1999 requires suitable arrangements to be put in place for planning, organising, controlling, monitoring and reviewing health and safety risks. For water hygiene, this means having an appropriate governance structure with competent people, defined responsibilities, risk assessment processes, monitoring arrangements and review mechanisms to ensure water hygiene risks are being managed effectively. • Under Control of Substances Hazardous to Health Regulations 2002 (COSHH) Legionella bacteria is treated as a hazardous biological agent, so requires the risk of exposure to be assessed and actions taken to prevent or adequately control the risk, which are monitored for their effectiveness and maintain appropriate records. In practice, this requires Legionella risk assessments, monitoring, temperature checks, cleaning, disinfection and other controls set out in the Water Hygiene Written Scheme of Control.
1.5	The Health and Safety Executive (HSE) Approved Code of Practice (ACOP) L8: Legionnaires' Disease - The Control of Legionella Bacteria in Water Systems, together with HSG274 Part 2: The Control of Legionella Bacteria in Hot and Cold-Water Systems, provide practical guidance on meeting the above legal obligations and their application to the management of risks associated with exposure to Legionella bacteria and other water

	hygiene hazards The codes require appropriate allocation of responsibilities for managing water hygiene and Legionella risks.
1.6	Regulator of Social Housing (RSH) Consumer Standards 2024 and specifically the Safety and Quality Standard require registered providers of social housing (RPs) to: • identify and meet all legal requirements that relate to the health and safety of tenants in their homes and communal areas; and • ensure all required actions arising from legally required health and safety assessments are carried out within appropriate timescales.
2.	POLICY STATEMENTS
2.1	whg recognises its legal responsibilities relating to water hygiene risks, including the risk of exposure to Legionella bacteria, in water systems for which it has responsibility.
2.2	whg will have due regard to the HSE ACOP L8: Legionnaires' Disease, the Control of Legionella Bacteria in Water Systems and supporting guidance contained within HSG274 Part 2: The Control of Legionella Bacteria in Hot and Cold-Water Systems, together with any other relevant legislation, guidance and recognised good practice.
2.3	To meet its legal and regulatory obligations, whg will: • Identify and assess water hygiene risks arising from water systems for which it has responsibility. • Maintain a Water Hygiene Written Scheme of Control which defines the arrangements for assessing, managing, monitoring and reviewing water hygiene risks • Implement, manage and monitor control measures proportionate to the level of risk identified. • Maintain appropriate records demonstrating the implementation of water hygiene management arrangements. • Appoint competent persons with appropriate authority, knowledge, skills and experience to support compliance with this policy and the Water Hygiene Written Scheme of Control. The detailed operational arrangements through which these commitments are delivered are defined within the Water Hygiene Written Scheme of Control and associated compliance procedures.
2.4	whg will ensure anyone undertaking water hygiene activities is competent for the duties assigned to them and will only use specialist contractors who are members of the Legionella Control Association (LCA), or can otherwise demonstrate an equivalent level of competence, accreditation and experience.
2.5	whg will allocate sufficient resources to ensure water storage and distribution systems are operated and maintained in accordance with current law and guidance.
	Risk management
2.6	whg shall maintain arrangements to identify, assess and manage water hygiene risks. Detailed requirements relating to change management, risk assessment, implementation of control measures and monitoring of water hygiene risks will be defined within the Water Hygiene Written Scheme of Control and associated compliance arrangements.

2.7	Risk assessments shall be undertaken and reviewed in accordance with the Water Hygiene Written Scheme of Control and associated compliance arrangements for all water systems for which whg has responsibility. This includes new, altered and acquired water systems as a result of stock acquisitions and transfers of property, new developments, refurbishment projects, changes in building use or occupancy and any other modifications to water systems and other material changes that may affect water hygiene risks.
2.9	whg will maintain appropriate records demonstrating the implementation of water hygiene management arrangements. Information arising from risk assessments, monitoring, inspections, sampling, maintenance activities, audits and contractor reports shall be reviewed through established compliance and governance arrangements.
	Roles and responsibilities
2.10	whg's governance structure and responsibilities for managing water hygiene and Legionella is set out below.
	The Duty Holder
2.11	The Duty Holder is responsible for managing Legionella risks at a strategic level and ensuring whg maintains suitable arrangements for managing water hygiene and Legionella risks. The Group Chief Executive is ultimately accountable for ensuring that whg meets its statutory obligations in relation to water systems for which it has responsibility.
2.12	The Duty Holder shall appoint a Responsible Person in writing who possesses sufficient authority, competence, knowledge and organisational influence to ensure that water hygiene management arrangements are implemented effectively and identified risks are appropriately managed and escalated where necessary.
	The Responsible Person: Director of Building Safety & Compliance
2.13	The Responsible Person shall have operational responsibility for the effective management of water hygiene and Legionella risks across whg's premises and the implementation of this policy, the Water Hygiene Written Scheme of Control and associated compliance arrangements with support from the Deputy Responsible Person, Authorised Persons and Competent Persons.
2.14	Suspected or confirmed cases of Legionnaires' disease associated with water systems for which whg has responsibility shall be escalated to the Responsible Person and managed in accordance with the Water Hygiene Written Scheme of Control and applicable reporting requirements.
	The Deputy Responsible Person: Head of Compliance
2.15	The Deputy Responsible Person shall support the Responsible Person in the delivery of whg's water hygiene management arrangements and act on their behalf where required. The Deputy Responsible Person shall assist in ensuring that appropriate arrangements are maintained for the assessment, management, monitoring and control of water hygiene risks and that compliance information is reviewed through established governance arrangements.

2.16	The Deputy Responsible Person shall support the implementation of the Water Hygiene Policy, Water Hygiene Written Scheme of Control and associated compliance arrangements, including the management of corrective actions, contractor performance and assurance activities where appropriate.
	Authorised Persons
2.17	whg shall appoint one or more Authorised Persons to provide day-to-day oversight of water hygiene compliance activities. Authorised Persons shall possess sufficient knowledge, skills, experience and authority to monitor compliance arrangements, review information arising from inspections, monitoring and risk assessments, and initiate appropriate corrective actions where required.
2.18	Authorised Persons shall support the Responsible Person and Deputy Responsible Person by monitoring the implementation of the Water Hygiene Written Scheme of Control, reviewing performance information, managing routine compliance activities and escalating significant findings or concerns through established governance arrangements.
	Competent Persons
2.19	Competent Persons are appointed to undertake water hygiene activities on behalf of the organisation including inspections, monitoring, maintenance, sampling, risk assessment and other specialist activities within the scope of their competence and in accordance with the Water Hygiene Written Scheme of Control, associated procedures and recognised industry standards. Suitably trained whg colleagues, specialist contractors, consultants and other persons can be appointed as Competent Persons.
	Customers
2.20	Customers have a role in supporting good water hygiene within their homes by reporting defects affecting water systems and maintaining basic hygiene around water outlets.
3.	PERFORMANCE MONITORING
3.1	whg shall monitor the effectiveness of water hygiene management arrangements through review of risk assessments, control measures, compliance records, contractor outputs, assurance activity and performance information. Risk assessments shall be reviewed where there is reason to believe they are no longer valid, or where changes occur that may affect water hygiene risks.
3.2	whg shall maintain proportionate assurance arrangements to verify the effectiveness of water hygiene controls and contractor performance. Assurance activities may include desktop audits, site inspections, performance monitoring, review of contractor outputs and independent verification activities where appropriate.
4.	DIVERSITY AND INCLUSION
4.1	The management of water hygiene risks helps protect the health, safety and wellbeing of all customers. whg recognises that some people may be at greater risk from exposure to Legionella bacteria, including older people, people with certain health conditions and those with weakened immune systems. Water hygiene inspections, monitoring activities and remedial works may also have a disproportionate impact on some customers. whg will have regard to its responsibilities under the Equality Act 2010 and will consider

	equality, diversity, accessibility and vulnerability when planning and delivering water hygiene activities. Where appropriate, reasonable adjustments, additional support or alternative arrangements will be considered in accordance with the Vulnerability Policy. Detailed operational arrangements are set out within associated documents, policies and procedures.
5.	TRAINING AND COMMUNICATION
5.1	Colleagues with responsibilities under this policy shall be provided with appropriate information, instruction, training and support to enable them to discharge their duties effectively.
5.2	Detailed competence requirements shall be maintained through role profiles, competency frameworks, organisational learning arrangements and associated compliance procedures.
5.3	whg will provide customers with information and guidance to support good water hygiene practices, promote awareness of water hygiene risks and explain any actions customers may need to take. Communications will be designed to be clear, accessible and inclusive, with alternative formats, translations and reasonable adjustments considered where appropriate to support customers with different needs.
6.	REVIEW
6.1	This policy will be monitored by the Director of Building Safety and Compliance and reviewed every three years by the Asset Investment Panel.
7.	ASSOCIATED DOCUMENTS, POLICIES AND PROCEDURES
7.1	Documents, policies and procedures associated with this policy include: • Water Hygiene Written Scheme of Control • Vulnerability Policy • Health and Safety Policy • Asset Management Strategy • Repairs Policy • Legionella Risk Assessments • Water Hygiene Operational Standards and Appendices

DOCUMENT CONTROL

Document author	Head of Compliance
Document owner	Director of Building Safety & Compliance
Reviewed/approved by	Asset Investment Panel
Review Date	Quarter 2 2029
Key changes made	• Governance arrangements updated to reflect current organisational structure and responsibilities. • Introduction of the Water Hygiene Written Scheme of Control. • References to legislation, ACOP L8 and HSG274 Part 2 reviewed and updated. • Introduction of arrangements for the management of new, altered and acquired water systems. • Policy aligned with the Water Hygiene Written Scheme of Control and associated compliance arrangements. • Competence, contractor management and assurance requirements clarified. • Obsolete references, terminology and historic role references removed. • Introduction of Deputy Responsible Person, Authorised Persons and Competent Persons roles.