

WATER HYGIENE POLICY

Version	4.0	Issue Date	July 2022	Review	June 2025
Sponsor	Rupert Lecomber	Job Title	Director of Strategic Asset Management		
Author	Alicia Wheeler	Job Title	Health and Safety Manager		
Reviewed by	Rob Lewis	Job Title	Principal Commercial Officer, South Cambridgeshire Environmental Health		
Board Approval			May 2022		

POLICY STATEMENT

Housing 21 recognises that it has a duty to protect employees, residents, visitors, and the general public who may come into contact with the water systems it manages. The organisation will take all reasonable precautions to ensure the water storage systems within its control are safe and to prevent or control the harmful effects of contaminated water (i.e., Legionella) to residents, employees and other persons working at or using its premises.

This Policy sets out Housing 21's commitment to meeting its obligations as a responsible person under all relevant legislation and statutory guidance (S.6), to provide safe homes for our residents, safe workplaces for our employees and ensure the safety of visitors.

1. BACKGROUND AND SCOPE

This Policy covers the management and control of Legionella in water systems in all residential and commercial properties owned and managed by Housing 21. Housing 21 is committed to ensuring that our resident's homes, and our office premises are safe and secure places to live and work in.

Legionella bacteria can cause Legionnaires' disease, a potentially fatal form of pneumonia and everyone is susceptible to infection. For Legionnaires' disease to develop, the Legionella bacteria is water borne and is usually transferred by inhalation of water droplets. Under normal conditions, the disease cannot be passed from one person to another.

Housing 21 will ensure so far as reasonably practicable that residents, employees, and visitors to our properties are not exposed to any risks to their health or safety in relation to water.

To ensure compliance with legal and regulatory framework, Housing 21 will:

- Maintain an operational risk management approach.
- identify and assess sources of risk
- understand and comply with all relevant legislation (see table below).
- undertake Legionella risk assessments for all properties with shared water supplies at least every two years and more frequently where the risk assessment suggests it.
- carry out remediation and monitoring actions as identified in the risk assessment within the appropriate timescales.
- provide monitoring and management programmes as required, preparing a written scheme for eliminating, preventing, or controlling the risk.
- implement, manage, and monitor risk appropriate precautions to prevent or minimise the risk of exposure to Legionella.
- employ competent and skilled contractors, monitoring the performance of these contractors on an ongoing, regular basis.
- keep records of the precautions (electronically and on-site logbooks) implemented for each of the premises under our control.
- provide regular training for employees involved in controlling legionella to ensure that knowledge is appropriate and in line with current legislation and guidance.
- communicate key compliance messages.
- seek independent assurance and challenge on our performance; and
- report on our performance including internal checks and audits to the Board.

2. ROLES AND RESPONSIBILITIES

The HSE Approved Code of Practice L8 "Legionnaires' disease: The control of legionella bacteria in water systems" and "Legionnaires' disease: Technical guidance" document HSG 274 identify two roles having specific responsibility for the management of legionella bacteria. Water Hygiene Management will be the

responsibility of the Chief Executive at a strategic level and the Director of Property Services at an operational level, with support from identified competent employees.

2.1 The Duty Holder: Chief Executive

The Duty Holder must appoint in writing a Responsible Person to take managerial responsibility for controlling legionella in Housing 21 premises and ensure that Housing 21 meets its statutory obligations. The Chief Executive is ultimately responsible for health and safety and safe operation of the water systems within Housing 21 premises.

2.2 The Responsible Person: Director of Property Services

The Responsible Person (RP) has managerial responsibility for the control of legionella bacteria within all Housing 21 premises. The RP is responsible for the implementation and management of the Water Hygiene Management Plan and will have overall responsibility and accountability for overseeing performance compliance for water safety and remedial actions. They will:

- Ensure effective implementation of the Water Hygiene Management Policy
- Ensure adequate resources (funds, materials, equipment, employees, and time) are allocated to manager water safety inspection, testing and associated remedial works
- Monitor the performance of service areas against the Water Hygiene Management Plan (Appendix i.) to ensure all actions arising from the management of water safety are concluded.
- Advise the Chief Executive of any problem arising in connection with the management of water safety and compliance with the Water Hygiene Management Policy; and
- Ensure the right assignment of responsibilities and resources are in place for operational requirements in meeting statutory requirements as set out within the Water Hygiene Management Policy.

2.3 Head of Compliance

The National Compliance Manager is responsible for developing internal controls and policies that are designed to ensure that all compliance needs are met. The includes identifying potential risks, directing investigations, undertaking audits, and developing management strategies.

2.4 Managers and employees responsible for the detailed arrangements necessary to manage water safety include:

- Head of Technical Services
- Health and Safety Manager
- Contracts Manager
- Development Team
- Housing Operational Teams*

2.5 Water Hygiene Contractors – competent persons

Contractors appointed to carry out water hygiene management work will be registered by the

Legionella Control Association (LCA) for each service they undertake, see WH Guidance Note Three., Contractors Specification/Schedule. Reports provided will comply with BS8580-1:2019. Sampling for legionella bacteria in water systems will comply with BS7592:2021.

Only appropriately skilled and competent employees or contractors will carry out heating checks and maintenance. A person shall be deemed skilled to carry out the appropriate inspection and testing only if they have sufficient qualification, knowledge, and experience.

2.6 *Housing/Housing and Care/Court Managers duties and responsibilities include:

- Identifying all locations within their court where water is not being used regularly (underutilised outlets); see WH Guidance Note Two.
- Implementing a weekly flushing regime of all under-utilised outlets and maintaining records.
- Ensure remedial works are completed in the required timeframe.

2.7 Resident Responsibilities

Residents will be provided with information on the management arrangements for the risk of exposure to water-borne bacteria such as Legionella.

Residents must allow appointed contractors into their home to service/check the water systems where necessary.

If residents continue to refuse access after repeated requests, Housing 21 will follow its Access Procedure to gain access to carry out necessary safety checks and works. If a resident continually refuses access, they will be in breach of their tenancy and Housing 21 will take legal action.

Residents should maintain their own appliances and water outlets in line with health and safety guidelines with regards to Legionella control e.g., taps, shower heads. Where not carried out by external contractors', shower heads should be regularly cleaned and disinfected. Residents should not adjust the temperature setting of hot water cylinders or calorifier as this could lead to legionella.

3. WATER HYGIENE MANAGEMENT PLAN

Housing 21's Water Hygiene Management Plan (WHMP), WH Guidance Note One., details the organisations approach to water hygiene. Implementing the processes and controls detailed in the Water Hygiene Management Plan will reduce the risk of legionella development.

The WHMP details actions and processes regarding:

- How and when risk assessments are undertaken
- Access process.
- Development of 'written schemes' where appropriate.
- Ensuring that various inspection regimes are undertaken and recorded.
- Ensuring logbooks (electronic and hard copy) are regularly updated and maintained for inspection.
- Selection and management of contractors.
- Appointment and training of Responsible/Competent person(s).
- Water hygiene in empty properties.
- Audit processes and control measures; and
- Monitoring and review.

4. MEASURING COMPLIANCE

The Director of Property Services will regularly report to the Executive Team and the Safety Forum on the progress and performance of the Water Hygiene Management programme, in accordance with approved Key Performance Indicators (KPI's) which shall include:

- The Water Hygiene Risk Assessment programme
- Completion of water risk assessment identified remedial actions against an action plan for completion
- Water risk assessment actions that are overdue
- Water monitoring and testing regimes

5. CONTRACTORS PERFORMANCE

- 5.1 Contractor Performance will be reviewed/audited, and compliance monitored regularly to ensure that the programme of service and inspection continues to comply with this Policy.
- 5.2 Housing 21 will carry out a sample audit of contractor servicing competence using an external consultant. The finding will be reported to the Safety Forum.
- 5.3 If residents or employees have concerns with a contractor, the 'M&E Contractor Escalation Form' should be completed (Wilma homepage/Tools and Applications). The log is regularly reviewed by the Contracts Managers who raise issues at performance meetings. Once resolved the Contracts Manager will update the log with the action taken.

6. TRAINING

All relevant employees will receive water hygiene management training appropriate to their role.

All employees will be adequately informed and instructed regarding the identification, management, and risk from exposure to water-borne bacteria.

7. LEGISLATION AND REGULATIONS

Document	Relevance
Health & Safety at Work etc Act 1974	Sections 2 and 3 require employers to, as far as is reasonably practicable, reduce health and safety risks to

	employees, and those not in their employment but who may be affected by their activities.
The Management of Health and Safety at Work Regulations 1999	Requires employers to complete a suitable and sufficient assessment of the risk to employees, and those not in their employment but who may be affected by their activities.
Approved Code of Practice L8 – Legionnaires Disease – The control of legionella bacteria in water systems	HSE’s approved code of practice for managing Legionella. Whilst this is not legislation, it is considered as a definitive guide and should be followed to ensure compliance with the law. The ACoP L8 has quasi-legal status and if not followed, evidence would be required to show that compliance has been met in an alternative way.
Control of Substances Hazardous to Health Act (COSHH) 2002	Requires employers to manage the risk of hazardous substances, including biological agents such as Legionella. Regulation 7 requires measures to control the risk.
Building Regulations – Approved Document G (03/16)	Provides guidance on the supply of water to a property, including water safety, hot water supply, sanitation and water efficiency i.e. an easily accessible water supply that doesn’t incur wastage.
BS 8580-1:2019	Water quality, risk assessments for Legionella control – Code of practice
BS7592:2021	Sampling for legionella bacteria in water systems
Landlord and Tenant Act 1985	‘... keep in repair and proper working order the installations in the dwelling house for water, gas, and electricity ...’
Defective Premises Act 1972	Section 4 places a ‘duty of care’ on the landlord in relation to any person who might be affected by a defect which would result in personal injury or damage to their property.

8. RECORD RETENTION

In accordance with HSG 274 records will be retained for the period they remain current and for at least two years afterwards, except for records kept for monitoring and inspection, which will be kept for at least five years.

9. CONSULTATION

- 9.1 Housing 21's Health and Safety Forum and Policy Steering Group have been consulted about the development of this Policy.
- 9.2 Specific input of technical advice has been sought from Housing 21 employees with operational knowledge of water hygiene management (see Section Two.)
- 9.3 Housing 21's Primary Authority, South Cambridgeshire District Council, Environmental Health have been consulted and approved the final policy.

10. RESPECT AND INCLUSION

- 10.1 Housing 21 aspire to embed diversity and inclusion within all our organisational activities to enable these principles to become part of our everyday processes.
- 10.2 If any factors arise that warrant consideration based on these grounds, the association will look at the issue and its priority.

11. EQUALITY IMPACT ASSESSMENT

A full Equality Impact Assessment (EIA) has been completed by the Director of Property Services and the Health and Safety Manager.

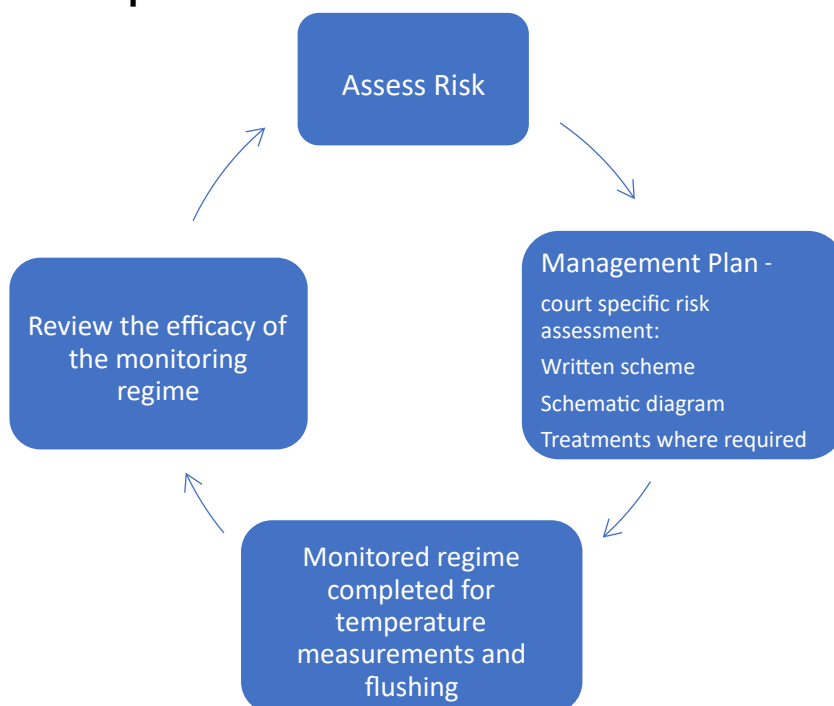
12. SAFEGUARDING

If a contractor needs to raise a safeguarding issue this should be emailed directly to the Safeguarding Team at Housing 21: safeguarding@housing21.org.uk.

WH Guidance Note 1**WATER HYGIENE MANAGEMENT PLAN**

The Water Hygiene Management Plan is designed to control and minimise the exposure to legionella or similar bacteria and the related health risks to anyone working, living, or visiting Housing 21 properties.

The management plan applies to hot and cold-water services only.

Management Plan process**Water Hygiene/Legionella Risk Assessment**

The approved specialist contractor will complete the risk assessment to BS8580 in accordance with HSG274 and guidelines from the Legionella Contractors Association (LCA). The legionella risk assessment should be reviewed annually by the Housing/Court Manager and every two years by the approved specialist contractor.

Copies of the risk assessments are maintained electronically on the organisation's shared drive [here](#) and in the Premises Log Book for each individual court.

The legionella risk assessments are reviewed by the specialist contractor every two years or whenever there is reason to believe the original assessment is no longer valid i.e., where there have been:

- changes to the water system or its use.
- changes to the use of the building.
- new information about risks or control measures have become available.
- monitoring indicates that control measures are no longer effective.
- changes in key personnel.
- any cases of legionellosis have been associated with the system.

In any of the above circumstances the Head of Compliance must be notified to ensure that the legionella risk assessment, schematic diagrams, procedures, and information are updated to reflect the current situation.

The Housing/Court Manager annual review should include:

- a review of the Water Hygiene Risk Assessment.
- confirm that regular monitoring has taken place.
- confirm that all records in the Premises Logbook are up to date.
- that any remedial works associated with the risk assessment have been completed*.
- liaising with the Building Surveyor regarding any outstanding issues.

*Managers can issue non-specialist works to a competent contractor of their choice. Specialist works i.e., tank cleans, and disinfections will be managed by the Compliance Team.

When works are complete the Court Manager should update the risk assessment and the water hygiene logbook to evidence that the identified risks have been removed.

Written Scheme

Control of Substances Hazardous to Health (COSHH) Regulations require that measures are put in place to protect employees from the foreseeable risk of legionella. If it is not practicable to avoid exposure to legionella present in water systems, then HSE ACOP L8 requires that a Written Scheme is put in place.

The appointed specialist contractor will provide a Written Scheme which should include:

- A current plan showing layout of the plant or water system, including parts temporarily out of use (a schematic diagram is adequate);
- a description of the correct and safe operation of the system.
- the precautions to be taken including any physical treatments such as flushing the system or chemical treatments.
- checks to be carried out to ensure the effectiveness of the scheme and the frequency of such checks; and
- remedial actions to be taken if the scheme is shown not to be effective.

The Written Scheme must demonstrate how the risks are to be controlled, implemented, and managed, to include:

- the physical treatment programme such as the use of temperature control for hot and coldwater systems.
- the chemical treatment programme, including a description of the manufacturers data on effectiveness, the concentrations and contact time required.
- health and safety information for storage, handling, use and disposal of chemicals.
- remedial measures to take in case the control limits are exceeded, including lines of communication.
- cleaning and disinfection procedures.
- emergency procedures.

Consideration must be given to ensure the safety of customer groups when cleaning and disinfection is to take place, to ensure they do not bathe in or drink the water during disinfection or cleaning regimes.

It should also include full details of the correct operation, monitoring, and maintenance of the water system installation.

Schematic Diagrams must:

- be simple accurate representations of the water system layout including parts out of use
- be easy for anyone to interpret the layout without specialised knowledge or experience
- be current
- show the layout of the plant and equipment including positions of sentinel taps
- include servicing and control valves within the water system e.g., isolation valves
- include components relevant to legionella risk e.g., outlets, strainers, filters, parts out of use.

Premises Logbook

The premises logbook must be always maintained on site and be available to anyone that needs access to the following information:

- The current WHMP.
- The written scheme and details of its implementation and those responsible for its implementation.
- Current Legionella Risk Assessment including significant findings.
- Schematic diagram of the water system.
- Signing-in sheet/Monitoring/sampling records by the contractor.
- Monitoring records by the Housing/Court Manager.
- Details of any work completed on the water system.
- Training records of those involved in managing, monitoring, and controlling the risk from legionella.

All records shall be maintained for a minimum of five years and in accordance with HSE ACOP L8 4th Edition 2013.

Temperature regime control of Legionella

General approach used by Housing 21.

- Hot water should be stored at 60 deg C
- Distributed so it reaches a temperature of 50 deg C within one minute at outlets.

Hot water at 50 deg C has a lower potential risk of scalding for most people. An increased risk is present for vulnerable people including the elderly, those with learning difficulties or sensory loss.

Where a significant scalding risk is present e.g., for the protection of the elderly the use of thermostatic mixing valves (TMV's) on baths and basin-taps is recommended. Recommended temperatures are risk based depending upon the environment (assessed locally) and range up to 44 deg C.

Water hygiene contractors should ensure the devices are installed correctly, working safely, and serviced in accordance with the manufacturers' guidelines. They must be suitable for the water conditions of the area.

Monitoring of water temperatures should be carried out in accordance with the regime for the premises.

WH Guidance Note Two**WATER HYGIENE MANAGEMENT – OPERATIONAL GUIDANCE FOR EMPLOYEES**

You can obtain a copy of the Water Hygiene Risk Assessment for your court [here](#).

The Weekly flushing of under-utilised water outlets

Water outlets that are used infrequently should be flushed through on a regular (weekly) basis to ensure that the outlet is free from any contamination that could possibly support the growth of bacteria.

All categories of under-utilised outlets (below), should be identified:

1. Void properties (in addition to weekly flushing, the shower head should be removed whilst the property is void and the shower hose laid in the shower). It may be necessary to drain the property down, please confirm with your building surveyor.
2. Properties occupied but where the shower is NOT being used.
3. Properties where showers are only used ONCE per week.

The flushing task should then be carried out on a weekly basis for ten minutes as follows:

Run the water from the outlet (i.e., tap/shower head) and run it long enough (10 minutes) to ensure the whole contents of the connecting pipe work are discharged and the water is visually clear.

Record the flushing procedure and maintain records in the water hygiene logbook. Confirmation of flushing across the scheme should be recorded on Pebbles.

Concerns about water quality

Housing/Court Managers must ensure that all customer enquiries regarding water hygiene management in their scheme are forwarded to the Compliance Manager.

Housing 21 Compliance Team (CT) to be notified immediately.

Housing 21 CT will agree and put in place an appropriate Action Plan to ensure immediate review and resolution with minimal disruption to employees and residents.

Housing 21 CT will liaise with the WHC, who will attend site and follow agreed procedure, risk assessing and disinfecting/sanitising as appropriate (to include taking samples before and after disinfecting).

In extreme cases, if notified by the GP or hospital the local Public Health Team may attend site to ensure that necessary works have been actioned.

If harmful bacteria are discovered

If Legionella bacteria are found by the Water Hygiene Contractor (WHC) to be over 100 cfu/l then:

- WHC to immediately notify the Housing 21 Compliance Team.
- WHC to follow their in-house procedure (as per the Legionella Control Association's guidelines) maintaining regular communication with the Housing 21 Compliance Team.
- Housing 21 Compliance Team will notify all relevant internal parties, including
 - Court/Housing/Housing and Care Manager
 - Health & Safety Manager
 - Head of Technical Services

The relevant Manager, acting on the advice of the Compliance Team, will determine whether a formal communication should be issued to affected residents. This will normally only be if certain parameters are met and will be in the specified format either 'routine water sampling has indicated a slight increase in bacteria levels, these do not present a risk to your health but we are retesting' or 'routine water sampling has indicated what may, or may not, require some remedial actions to ensure that normal water quality is maintained/some precautionary action (has been) taken and confirmatory sampling has also been undertaken/as soon as the results are known (in two weeks) we will communicate to everyone'.

If only one or two samples are above 100cfu/l then the WHC will immediately resample all positive locations and also elsewhere in the system. If the results are found to be still at least 100cfu/l then the risk assessment and control measures will be reviewed by the WHC in conjunction with the Housing 21 Compliance Team.

WATER HYGIENE LOG-BOOK WEEKLY FLUSHING OF UNDER-UTILISED WATER OUTLETS

[illegible]

WATER HYGIENE MANAGEMENT – CONTRACTOR SPECIFICATION/SCHEDULE

Specialist Contractors will be appointed by Housing 21 to ensure that its legal duty to manage water systems for legionella and other waterborne pathogens as stated in HSE Accepted Code of Practice and Guidance – Legionnaires’ Disease (L8) are fulfilled and follow the practices described in the Technical Guidance HSG274 Legionnaires’ disease.

Water Hygiene contractors are appointed for the provision of Legionella and Water Hygiene Risk Assessment, Water Hygiene Control and Monitoring, Maintenance and Consultancy Services as set out below:

Legionella Risk Assessment	Undertake legionella risk assessments on all properties and offer advice, action plans and written schemes. Review risk assessment at least every two years or sooner if necessary. Provide direct communication to Housing 21 Compliance Team to discuss and agree on the appropriate action and written schemes.
Hot and Cold Monitoring and Inspection Services	Periodic monitoring of the hot and cold systems in any building type as required by the risk assessment, completing logbooks and site monitoring software. Inspecting pipework, new and existing, for changes and the risk created by dead legs or changes of use.
Legionella Analytical Services	Undertake the sampling of water and provide test certificates. Legionella and any other microbiological test performed in an ISO/IEC 17025:2005 and accredited laboratory. Test to be undertaken for: Legionella Drinking Water Drinking water (sanitary) sample TVC, Coliforms, E. coli
Non-Essential Services	Survey building and ensure existing schematics are, where practicable, accurate. Update existing drawings provided from proficient paper sketches, image, or pdf file etc.
Water Treatment Services	Application of a water treatment programme for the control of legionella bacteria in all types of water system whether by chemical or non-chemical means. Supply and maintenance of the dosing equipment and continuous supply of the chemicals.

Cleaning and Disinfection Services	Chlorination/disinfection in accordance with services supplying water for domestic use within buildings and their curtilages. Water treatment of closed heating and cooling systems. Biocide washing of closed systems. Dynamic flushing of closed systems.
---	--

General monitoring by the Water Hygiene Contractor is required to allow for the early detection of problems in maintaining the control regime in line with [HSE guidelines](#) .

Inspection frequencies for risk systems		
Hot and cold-water systems		
Hot water services	Inspect calorifier internally by removing inspection hatch or using a boroscope and clean by draining the vessel. The frequency of inspection and cleaning should be subject to the findings and increased or decreased based on conditions recorded.	Annually, or as indicated by the rate of fouling
	Where there is not inspection hatch to the calorifier, purge any debris in the base of the calorifier to a suitable drain. Collect the initial flush from the base of hot water heaters to inspect clarity, quantity of debris and temperature.	Annually, but may be increased as indicated by the risk assessment or result of inspection findings
	Check temperatures in flow and return at calorifiers	Monthly
	Check water temperature up to one minute to see if it has reached 50 deg C in sentinel taps.	Monthly (percentage)
	If TMV's are fitted, measure temperature at the hot water inlet to the TMV's as directed by the risk assessment.	Monthly (percentage)
	Monitoring for legionella in line with ACoP L8.	Annually: Calorifier drain.
	The need for Legionella testing will depend on the system and the outcome of the risk assessment.	Refer to note below*

Cold water services	Check tank water temperature remote from ball valve and mains temperature at ball valve.	Six monthly
	Check that temperature is below 20 deg C after running the water for up to two minutes in the sentinel taps.	Monthly
	Visually inspect cold water storage tanks and carry out cleaning. Identify necessary remedial works. Check representative taps for temperature as above on a rotational basis.	Annually
	Monitoring for Legionella should take place from the cold-water storage tank and the furthest outlet from the tank. Samples may also be required from outlets in areas of particular concern.	Refer to note below*
Shower heads	Dismantle, clean and descale shower heads and hoses	Quarterly – EC only
Legionella testing*	Apart from annual sampling of the calorifier drain, Legionella sampling frequency will be subject to the courts Water Hygiene Risk Assessment.	As indicated by risk assessment i.e. where there is stored water.
Thermostatic Mixing Valves (TMV's)	Maintenance of TMV units	Annually
Other risk systems		

Sprinkler/ Water misting systems	Ensure automatic purge of residual water is functioning Clean and disinfect all wetted parts Sample for Legionella	As part of machinery shut down. As indicated by RA As indicated by RA
--	--	---

Contractor Performance

Contractor Performance will be reviewed/audited, and compliance monitored regularly to ensure that the programme and resulting tests comply with this policy.

The data held will consist of dates the last test was carried out and the resulting certificate.