

Water Hygiene Policy	
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1.0 Introduction

- 1.1 The Control of Substances Hazardous to Health Regulations 2002, the Management of Health and Safety at Work Regulations 1999 and the Health and Safety at Work Act 1974 place duties on Beyond Housing, as an employer or business in control of a premises (e.g. a landlord), to take suitable precautions to prevent or control the risk of exposure to legionella.
- 1.2 Poor management of water hygiene can pose a significant risk to the health of our customers, colleagues and contractors and can result in contracting diseases collectively known as legionellosis which includes but is not limited to legionnaire's disease and pneumonia.
- 1.3 Managing the water hygiene risk requires measures which reduce and/or control the risk of legionella growth and proliferation of legionella bacteria and other organisms in the water systems and reduce, so far as is reasonably practicable, exposure to water droplets and aerosol in non-domestic and domestic properties as required.

- 1.4 While the design of an appropriate water storage system within a building is intended to prevent the risk of bacterial growth, effective water hygiene management arrangements ensure that the risk of any exposure is significantly reduced so that the impact of ill health is minimised.
- 1.5 The water hygiene policy defines the practical arrangements for effectively managing the risks of stored water across Beyond Housing's premises with the aim of preventing any ill health from exposure to water borne bacteria.
- 1.6 Compliance with the requirements of this policy is mandatory in the context of business governance and risk management and Beyond Housing will ensure that we discharge our statutory duties.

2.0 Statement of Intent

- 2.1 Beyond Housing recognises the risks posed by bacteria growth in stored water systems and acknowledges the statutory obligations imposed by the Health and Safety at Work Act 1974 and other applicable regulations with respect to the management of water hygiene.
- 2.2 Beyond Housing is committed to providing a safe environment for its employees, contractors, customers and visitors, by conducting its business in a way that protects the health, safety and welfare of each individual.
- 2.3 With this aim, Beyond Housing will ensure that water hygiene management arrangements are established, maintained and promoted to ensure continual improvement across the operation of its services by:
 - Ensuring that suitable and sufficient governance arrangements are in place to manage water hygiene risks
 - Ensuring that an effective management structure is established which defines clear roles and responsibilities for the management of water hygiene
 - Provision of adequate resources to ensure effective management of water hygiene
 - Ensuring that the risks posed by legionella bacteria in water are assessed and adequately controlled to reduce those risks to a negligible/tolerable level
 - Ensuring that mechanisms are established to minimise, so far as is reasonably practicable, the growth of legionella bacteria in water systems present within the buildings that Beyond Housing owns or manages
 - Promoting awareness of the risks posed by poor water hygiene via the provision of adequate information, instruction and training to the appointed duty holder, responsible person(s) and competent person(s) involved in the management of water hygiene as well as all relevant colleagues, customers and other stakeholders
 - Regularly monitoring compliance with the requirements of the Health and Safety at Work Act (1974) and supporting regulations and the water hygiene policy.



Signed:

Date: 22 November 2022

Rosemary Du Rose, Chief Executive

3.0 Policy objectives, key performance indicators (KPI's) and reporting

3.1 The objectives of the water hygiene policy are to:

- Identify the nominated '**duty holder**' in relation to control of water hygiene
- Ensure that a competent '**responsible person or persons**' are appointed to take day-to-day responsibility for managing and controlling any identified risks from legionella bacteria and record and maintain accurate property compliance records
- Ensure that a **competent person(s)** are appointed to complete legionella risk assessments and prepare schemes of work for hot and cold water systems, sprinkler and mist systems, cooling plant and any other systems that can produce water droplets to establish any potential risks and implement measures to either eliminate or control identified risks
- Ensure that measures are developed to control the risk from legionella in domestic properties which either eliminate the legionella risk or control the adequately control the residual risks
- Prepare **schemes of work** for each non domestic property and establish and manage servicing and maintenance regimes to ensure that risks associated with bacterial growth in water are minimised so far as is reasonably practicable
- Ensure that all **legionella risk assessments** and schemes of work are reviewed no later than the date of review identified within the previous legionella risk assessments/schemes or work
- Ensure that robust mechanisms are established to record and monitor the implementation of legionella risk assessments and individual non domestic property schemes of work
- Ensure periodic water hygiene sampling and compliance audits are undertaken and the findings reported via the health and safety framework
- Ensure that water hygiene reporting mechanisms are in place to report on water hygiene performance.

3.2 The water hygiene policy applies to all Beyond Housing colleagues, contractors, customers and other stakeholders, who may occupy, work within, visit, use premises or who may be affected by activities or provision of services undertaken by Beyond Housing within its property portfolio including:

- **Domestic residential properties**

- Void domestic houses and flats
- Multi occupancy domestic buildings communal areas with water systems

- **Non domestic properties**

- Office buildings
- Operational depots and stores
- Community centres
- Commercial properties.

KPI	Owner (job role)	Policy objective alignment
100% legionella risk assessments and water hygiene written schemes of work for all non domestic properties and communal areas identified in the water hygiene property register.	Director of Asset Management and Sustainability	Complete legionella risk assessments and establish a written scheme of work which specifies the measures required to control the legionella risk for each of the properties and communal areas identified in the water hygiene register. Ensure that all legionella risk assessments and schemes of work are reviewed no later than the date of review identified within the previous legionella risk assessments/schemes of work.
100% completion of the Water Hygiene Management Void Checklist CP 023 – 0.2 for all voids properties.	Director of Property	Completion of water hygiene checks to void domestic properties as identified in the Water Hygiene Management Void Checklist CP 023 – 0.2 to mitigate the risk of legionella in void domestic properties.
Compliance sampling of Biannual legionella risk assessments, schemes of work and void properties.	Health and Safety Manager	Inclusion of water hygiene sampling in the health and safety compliance procedure HSP44 v3 and complete biannual compliance sampling of legionella risk assessments, schemes of work and Water Hygiene Management Void Checklists CP 023 – 0.2.
Biennial audit of policy and supporting procedures by the H&S team.	Health & Safety Manager	Auditing the water hygiene policy and supporting management systems and procedures to identify areas of strength and areas for improvement.

Biennial audit of policy and supporting procedures by an external auditor.	Risk Manager	Auditing the water hygiene policy and supporting management systems and procedures to identify levels of assurance and risk.
Provision of water hygiene/legionella information to customers.	Director of Customer Services	Ensure that suitable and sufficient water hygiene information is provided to customers via the Beyond Housing website and the housing management letting arrangements.

4.0 Definitions

- 4.1 **Legionellosis** – Legionnaires’ disease is a potentially fatal pneumonia caused predominantly by the Legionella pneumophila bacteria. It is the most well-known and serious form of a group of diseases known as Legionellosis. Infection is caused by breathing in small droplets of water contaminated by the bacteria.
- 4.2 **Legionella risk assessment** - A Legionella risk assessment is an integral part of any water safety programme, often forming the base on which all future monitoring, preventative and reactive measures will be based. A Legionella specific assessment focuses on the water systems used within working environments and although there is a legal requirement for landlords to assess and control the exposure to Legionella bacteria, but there is no requirement for them to produce any form of documentation or certification and is generally not required for domestic water systems.
- 4.3 **Water systems** - A water system includes all plant/equipment and components associated with that system, e.g. all associated pipework, pumps, feed tanks, valves, showers, heat exchangers, water softeners, chillers, sprinklers etc.
- 4.4 **Written scheme of work** - an up-to-date plan showing the layout of the plant or water system, including parts temporarily out of use a schematic diagram is sufficient; a description of the correct and safe operation of the system the precautions to take; checks to carry out to ensure the written scheme is effective and the frequency of such checks; the remedial action to take if the written scheme is shown to be not effective.
- 4.5 **Water hygiene management system** - The water hygiene management system is a software application designed to simplify the task of storing, maintaining, controlling and managing a water asset monitoring, inspection and testing regime for the prevention of Legionnaires' disease.
- 4.6 **Dutyholder** – The ‘**dutyholder**’ is the appointed senior manager with overall responsibility for managing water hygiene and appointing a ‘**responsible person(s)**’ to manage the legionella risks and a **competent person(s)** to complete legionella risk assessments and prepare written schemes of work.

- 4.7 **Responsible person(s)** – a person or persons appointed by the ‘**dutyholder**’ to take day-to-day management and responsibility for controlling any identified risks from legionella in non domestic and domestic properties.
- 4.8 **Competent person(s)** - a person or persons appointed to complete legionella risk assessments and prepare, implement and manage water hygiene written schemes of work.

5.0 Legislative, regulatory and strategic alignment

- 5.1 Implementation of the water hygiene policy will ensure Beyond Housing meets its statutory obligations in respect of:
- The Health and Safety at Work etc. Act (1974)
 - The Management of Health and Safety at Work Regulations (1999)
 - The Control of Substances Hazardous to Health (2002)
 - ACOP L8 - Legionnaire’s disease: The control of legionella bacteria in water systems (4th edition 2013)
 - **Regulatory Standards** - the application of this policy will ensure compliance with the regulatory framework and consumer standards (Home Standard) for social housing in England, which was introduced by Regulator of Social Housing (RSH).

6.0 Responsibilities

- 6.1 The management structure and the designated roles and accountabilities for the implementation of the water hygiene policy across Beyond Housing are:
- 6.2 The **Chief Executive** has overall responsibility for the management of water hygiene within Beyond Housing and shall:
- Maintain a broad awareness of current statutory requirements and principles of good practice for water hygiene management
 - Ensure that a ‘**Duty Holder**’ is appointed to ensure that Beyond Housing effectively discharges its statutory duties.
 - Ensure that adequate resources are made available to administer, co-ordinate and implement the water hygiene policy.
- 6.3 The **Chief Operations Officer** is the appointed ‘**duty holder**’ and is responsible for the strategic and financial management for the delivery of services within the property and development and customers and communities directorates. The **Chief Operations Officer** is responsible for ensuring that effective water hygiene compliance assurance systems are established and maintained. The **Chief Operations Officer** shall:
- Appoint a ‘**responsible person**’ (**Director of Asset Management and Sustainability**) to ensure that legionella risk assessments, written schemes of work, management

arrangements and organisational support exist to effectively manage water hygiene on a day-to-day basis for non domestic properties and multi occupancy domestic building communal areas with water systems

- Appoint a '**responsible person**' (**Director of Property**) to ensure that management arrangements and organisational support exist to effectively manage water hygiene on a day-to-day basis for void domestic properties
- Ensuring that the water hygiene policy is maintained across Beyond Housing
- Co-ordinating and monitoring the effectiveness of water hygiene policy management arrangements across Beyond Housing and advising the **Chief Executive** of incidents, unacceptable risks and associated remedial action plans
- Ensuring that robust management systems, arrangements and organisational support exist to effectively manage water hygiene information and compliance KPI's are established to report and monitor performance
- Ensuring appropriate departmental resources are available to administer, co-ordinate and implement this policy
- Ensure that water hygiene management performance is regularly reviewed and reported to the **Senior Leadership team** and the **Board via the health and safety framework**.

6.4 The **Director of Asset Management and Sustainability**) is the appointed (**responsible person**) for non-domestic and multi occupancy domestic building communal areas with water systems. The **Director of Asset Management and Sustainability**) will be responsible for the allocation of adequate resources to manage water hygiene whilst ensuring compliance with regulatory requirements and the water hygiene policy. The **Director of Asset Management and Sustainability**) shall:

- Maintain a broad awareness of current statutory requirements and principles of good practice for water hygiene
- Consult with the **Chief Operations Officer** and wider **Leadership Team** as necessary to ensure adequate resources and facilities are allocated to achieve the objectives of the water hygiene policy
- Ensure where required procedures developed to support the policy delivery
- Ensure appropriate departmental resources are available to administer, co-ordinate and implement this policy
- Ensure that robust water hygiene management systems, arrangements and organisational support exist to effectively manage water hygiene information
- Appoint the **Facilities team** to ensure that legionella risk assessments, written schemes of work, management arrangements and organisational support exist to effectively manage water hygiene on a day-to-day basis
- Ensure that colleagues with water hygiene responsibilities are trained to ensures tasks are carried out in a safe, technically competent manner and that they receive regular refresher training
- Ensure that water hygiene management performance is regularly reviewed and reported **via the health and safety framework**.

6.5 The **Facilities team** shall:

- Ensure where required procedures developed to support the policy delivery
- Establish a register which identifies every non domestic property and domestic communal areas which have water systems
- Appoint a **competent person(s)** to complete legionella risk assessments and prepare, implement and manage a water hygiene written schemes of work for each property identified on the register
- Ensure regular water hygiene risk assessment reviews are completed and specifically when there is reason to believe that the original risk assessment may no longer be valid
- Ensure that robust water hygiene written schemes of work, water management systems, arrangements and organisation are in place and are reviewed on a regular basis
- Periodically monitor the performance of planned preventative maintenance regimes and responsive repairs to ensure that water storage systems are monitored, inspected and maintained across Beyond Housing property assets
- Undertake period asset data reviews to ensure adequate assurance is provided for water hygiene data held against Beyond Housing property assets is accurate and up to date
- Report to the Health & Safety team via the HSMS incidents or significant issues which pose a potential risk of ill health or statutory non-compliance.

6.6 The **Director of Property** is the appointed '**responsible person**'

for domestic (void) properties. The **Director of Property** will responsible for the allocation of adequate resources to manage water hygiene whilst ensuring compliance with regulatory requirements and the water hygiene policy. The **Director of Property and Commercial Operations** shall:

- Ensure where required procedures are developed to support the policy delivery
- Ensure that property and commercial operations colleagues with water hygiene responsibilities are trained to a level that ensures tasks are carried out in a safe, technically competent manner and that they receive regular refresher training
- Ensure that robust water hygiene management systems, arrangements and organisation are in place in relation to void domestic properties and they are reviewed on a regular basis
- Ensure sufficient resources are allocated to enable effective planned preventative maintenance and cyclical servicing regimes for water hygiene systems and building infrastructure are in place and maintained and processes are in place to capture, review, prioritise and respond to any significant findings
- Ensure appropriate departmental resources are available to administer, co-ordinate and implement this policy.

6.7 The **Director of Development and Regeneration** is responsible for leading development and regeneration activities, developing and managing external relationships and business development, whilst ensuring compliance with this policy and regulatory requirement. The **Director of Development and Regeneration** shall:

- Ensure where required procedures are developed to support the policy delivery

- Ensure so far as reasonably practicable that water systems are so designed and constructed that it will be safe and without risks to health when in use and in a manner that supports this policy
- Provide suitable and sufficient water hygiene information including water system test and commissioning certification and design information to the '**responsible person**' for all new build multi occupancy properties with communal areas.

6.8 The **Director of Customer Services** is responsible for the provision of water hygiene information to customers and shall:

- Ensure that suitable and sufficient water hygiene information is provided to customers via the Beyond Housing website and the housing management letting arrangements.

6.9 The **Health and Safety team** fulfil the role of competent persons as required by Management of Health and Safety at Work Regulations 1999 (Regulation 7). The **Health & Safety team** has specific responsibility for:

- Reviewing this policy every three years
- Providing advice and guidance in relation to water hygiene matters
- Advising on and contributing to the development of water hygiene policies and procedures which could have an impact on water hygiene matters, ensuring that documentation is legislatively compliant
- Undertaking biennial water hygiene compliance audits to ensure that Beyond Housing are compliant with policy, procedures and processes
- Ensuring that appropriate water hygiene compliance sampling is carried out on a regular basis and the findings reported via the health and safety framework
- Reviewing and reporting on water hygiene management performance and compliance via the health and safety framework.

7.0 Policy delivery

7.1 Water hygiene management arrangements

7.1.1 The following sections of the water hygiene policy detail the Beyond Housing's arrangements for managing and controlling water hygiene.

7.2 Legionella risk assessments

7.2.1 Beyond Housing will identify and maintain a register of all properties which have water systems which present a risk of exposure to legionella.

7.2.2 The '**responsible person(s)**' (**Director of Asset Management and Sustainability / Director of Property**) will appoint a **competent person(s)** to complete legionella risk assessments and ensure

that where necessary controls to manage legionella exposure are identified. The assessment shall take into account the individual nature of each site and consider the system as a whole.

- 7.2.3 Where the legionella risks are assessed to be, insignificant and are being properly managed to comply with legal requirements, no further action is required.
- 7.2.4 Beyond Housing will regularly review legionella risk assessments in case anything changes in the water systems that may affect the level of legionella risk.

7.3 Water hygiene schemes of work

- 7.3.1 The **‘responsible person’ (Director of Asset Management and Sustainability)** shall appoint a **competent person(s)** to prepare, implement and manage a written scheme of work which specifies the measures required to control the legionella risk for each individual non domestic property and multi occupancy domestic building communal areas with water systems that have been identified in the water hygiene property register.
- 7.3.2 Each scheme of work shall detail the required water testing regimes and monitoring, inspection and maintenance requirements.
- 7.3.3 Each scheme of work shall be reviewed on an annual basis or whenever there is a change to the water system.

7.4 Water hygiene management system (WHMS)

- 7.4.1 The WHMS utilised by Beyond Housing is a software application designed to simplify the task of controlling and managing a water asset monitoring, inspection and testing regime for the prevention of Legionnaires' disease.
- 7.4.2 The WHMS is a full electronic logbook that ensures that a properly managed water hygiene Management regime is in place and provides a full audit trail of every action taken.
- 7.4.3 The WHMS automatically schedules or reminds of all work to be done and ensures that no tests or checks are missed. The WHMS is also be configured to send out daily or immediate non-compliance alerts to key Beyond Housing colleagues.
- 7.4.4 The WHMS will provide a ‘live’ register which provides accurate live data applicable to each individual property identified on the water hygiene property register including:
- Legionella risk assessments and assessment reviews
 - Water testing regimes
 - Monitoring, inspection and maintenance status
 - Monitoring, inspection and maintenance non compliances

7.5 Void domestic properties

- 7.5.1 Beyond Housing have assessed the legionella risk for occupied domestic properties as 'low' due to the small domestic water system where daily water usage is inevitable and sufficient to turn over the entire water system; where cold water is directly from a wholesome mains supply; where hot water is fed from instantaneous heaters or low volume water heaters (supplying outlets at 50 °C) and where the only outlets are toilets and wash hand basins.
- 7.5.2 When a domestic property becomes void additional checks and controls will be implemented to ensure the legionella risk remains low. These checks will include flushing out the system prior to letting the property; avoiding debris getting into the system (e.g. ensure the cold water tanks, where fitted, have a tight fitting lid); setting control parameters (e.g. setting the temperature of the hot water cylinder (calorifier) to ensure water is stored at 60°C) and ensuring that any redundant pipework identified is removed.
- 7.5.3 These checks will be applicable on all void properties prior to commencing works which may affect the hot and cold water systems and that any identified risk control measures identified in the supporting procedures are fully implemented where identified.

7.6 Approved water hygiene services

- 7.6.1 Beyond Housing will ensure that only suitably competent consultants, surveyors, legionella risk assessors and engineers undertake works for the organisation in respect of water hygiene safety.
- 7.6.2 All water hygiene work required to be undertaken to Beyond Housing's property portfolio or plant/equipment within, will be conducted by Beyond Housing's property & commercial operations team or approved consultants and/or contractors who are approved via the Beyond Housing select list of contractor procedures.

7.7 Water hygiene information, instruction and training

- 7.7.1 Beyond Housing shall provide the following information, instruction and training relating to water hygiene:
- Legionella awareness
- 7.7.2 In addition to the training identified above all colleagues who use the WHMS will be provided with training relating to the use of the WHMS commensurate to their job role.
- 7.7.3 On the job training, will be provided to those employees who will be responsible for managing the programme of water hygiene checks and repair works as part of their daily job.

7.8 Water hygiene information for customers

- 7.8.1 To ensure that customers are aware of the risks posed by legionella and poor water hygiene, Beyond Housing will publicise information relating to water hygiene, via our website and during the housing management lettings process.

8.0 Consultation

- 8.1.1 This policy has been created with a multi-disciplinary team from across the Beyond Housing business include feedback from asset management, property and commercial operations, customers and communities and health and safety. Furthermore, impact assessments have been completed looking at data governance, equality, diversity and inclusion and considering the impact against the customer experience framework. Consequently, this feedback has helped shape the delivery of the policy and will be used to help inform underpinning procedures.

9.0 Approval and revision

- 9.1 This policy will be subject to a review every three years or in the instance that:
- Changes to existing or the introduction of new legislation
 - Changes to existing or the introduction of new Approved Codes of Practice / guidance
 - Changes to the Beyond Housing's organisational structure
 - Results of monitoring or audit findings which suggest that a review may be required
 - The findings of a major incident investigation
 - A request by the enforcing authorities (Health & Safety Executive, Fire and Rescue Service).
- 9.2 It will be the responsibility of the **Director of Governance and Business Assurance** to:
- Assess any request for the review of the policy and associated procedures
 - Consult with stakeholders regarding the proposed changes
 - Undertake a review and update the policy and procedures as required
 - Retain records of changes to the policy and procedures for future reference and audit as required.

Approval and revision Criteria		Information
Document written by:		Gavin Prothero
Document approved by:		Paul Smith
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5.0	September 2022	Policy migrated to new format, procedural items removed and added details of procedures added as appendices.
5.1	April 2023	Amended to reflect change of job titles to director of assets and sustainability and director of property

Appendix 1 – Supporting Procedures

Reference	Procedure	Procedure owner
HSP44	Compliance Sampling Procedure	Health and Safety Manager
PC 022 0.7	Water Hygiene Management - non domestic and multi occupancy domestic building communal areas with water systems	Asset Management - Facilities Manager
PO-PR-025	Water Hygiene Management – Domestic Void Properties	Property & Commercial Operations – Voids Manager