



Water Safety Compliance Policy



1. Introduction

- 1.1. Housing Plus Group (HPG) is a registered provider of housing and care services dedicated to offering safe and compliant homes and workplaces. HPG is committed to maintaining secure environments across all residential, office, and commercial properties.
- 1.2. Legionella bacteria occur naturally in water and can multiply in man-made water systems if not properly managed.
- 1.3. This Water Hygiene Compliance Policy sets out HPG's approach to protecting health by ensuring robust systems are in place to prevent Legionnaires' disease and fulfil our legal obligations as a landlord, care provider, and employer.
- 1.4. This policy addresses water hygiene risks within managed water systems (e.g. storage, distribution, and outlets) to prevent exposure to Legionella and similar pathogens.

2. Policy Statement

- 2.1. HPG has a legal duty under the Health and Safety at Work etc. Act 1974 to ensure, so far as is reasonably practicable, the health, safety, and welfare of its employees and others who may be affected by its activities. This includes protecting staff, residents, and visitors from exposure to Legionella bacteria.
- 2.2. In addition, under the Control of Substances Hazardous to Health Regulations 2002 (COSHH), and as outlined in the Approved Code of Practice (ACoP) L8, landlords and duty holders are required to assess and control the risk from biological agents such as Legionella. This includes conducting a suitable and sufficient risk assessment and implementing appropriate control measures.
- 2.3. HPG will ensure that incidents affecting the continuity of essential utilities are notified to the Care Quality Commission (CQC) where required under statutory regulation. This duty forms part of HPG's wider commitment to maintaining safe care and support environments in accordance with the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.
- 2.4. To ensure compliance with the ACoP L8 and HSG274 Technical Guidance, HPG will:
 - 2.4.1. Acknowledge the risk of Legionella and adopt the guiding principles set out in ACoP L8 and HSG274 to safeguard health and safety.
 - 2.4.2. Ensure all building and water systems are risk assessed by organisations accredited under the United Kingdom Accreditation Service (UKAS).
 - 2.4.3. Review risk assessments at appropriate intervals, or sooner where systems, use, or risk level change.
 - 2.4.4. Maintain Written Schemes of Control for all buildings where there is a foreseeable risk of exposure to Legionella, in accordance with ACoP L8 and HSG274. Operational oversight and document management are defined in the Legionella Management Plan (LMP).
 - 2.4.5. Designate a qualified and authorised individual to oversee the implementation and control of water hygiene risk management arrangements on behalf of HPG.
 - 2.4.6. Clearly outline roles and responsibilities for achieving compliance, as detailed in the Roles and Responsibilities section of this policy.

- 2.4.7. This policy will be reviewed at least every three years, or sooner if there are changes in legislation, guidance, or operational practices.
 - 2.4.8. Apply risk-based control measures to void properties prior to reoccupation, consistent with the LMP.
 - 2.4.9. Undertake independent audits of high-risk systems to confirm effective control and compliance.
 - 2.4.10. HPG will ensure that adequate resources and budgetary provision are made available to maintain compliance with water hygiene requirements.
 - 2.4.11. All personnel involved in managing Legionella risks will be appropriately informed, instructed, trained, and supervised.
 - 2.4.12. HPG will raise awareness among wider staff groups and customers about the hazards associated with Legionella bacteria, even if they are not directly involved in its management.
 - 2.4.13. Ensure all contractors maintain appropriate insurance, competence, and certification in line with Group procurement standards.
 - 2.4.14. Contracts or service level agreements will be in place with all contractors responsible for delivering water hygiene compliance services.
 - 2.4.15. Maintain robust contract management and performance monitoring arrangements, with outcomes reported through the Group's compliance governance structure.
 - 2.4.16. Maintain processes to ensure all property stock changes are incorporated into the compliance programme.
 - 2.4.17. Maintain arrangements to manage immediately dangerous situations identified through risk assessments or monitoring activities
 - 2.4.18. All water hygiene incidents will be fully investigated to identify root causes and prevent recurrence.
 - 2.4.19. All new installations, schemes, or replacement programmes will use equipment that prevents or minimises the risk of Legionella.
 - 2.4.20. Compliance teams will be engaged in design, specification, and handover of new and refurbished assets to ensure water safety is embedded from project inception
- 2.5. HPG will comply with all current and forthcoming statutory requirements set out under Awaab's Law. The organisation will ensure that hazards presenting a risk to health or safety within its homes are identified, investigated, and remedied within the timeframes prescribed by law, and that future phases of Awaab's Law are implemented as they come into force.

3. Policy Scope

- 3.1. This policy applies to all HPG staff, customers, visitors, contractors, and third-party providers who may be affected by HPG's activities in relation to water hygiene. It covers all domestic and non-domestic properties owned or managed by HPG, including communal systems serving multiple dwellings or shared spaces..
- 3.2. HPG is committed to full compliance with the Regulator of Social Housing regulatory framework, including the consumer standards applicable to social housing in England. This policy supports the delivery of the Home Standard, which requires registered providers to ensure customers live in safe, well-maintained homes and that all health and safety obligations are met.

- 3.3. This policy does not cover external drainage or rainwater systems, which are managed under HPG's property maintenance and health and safety policies
- 3.4. This policy should be read alongside other HPG compliance policies, including those for gas safety, electrical safety, fire safety, asbestos management, and lift safety.

4. Definitions

- 4.1. **Competent/Competency:** A suitably informed, instructed, trained, and experienced individual with the authority and technical knowledge to manage and control Legionella risks. Competence will be maintained through ongoing training, assessment, and experience, with formal qualifications used where appropriate.
- 4.2. **Customers:** Any individual or household to whom Housing Plus Group has a contractual or statutory duty to provide housing, care, support or related services. This includes (but is not limited to) tenants, residents, leaseholders, shared owners, service users in supported or specialist housing and care settings, and any other person occupying, receiving, or affected by services provided under the Group's management.
- 4.3. **Non-Domestic Premises:** All commercial, workplace, and residential buildings with communal or shared water systems
- 4.4. **Domestic Premises:** A self-contained dwelling (e.g. house, bungalow, or flat) occupied by a single household or family unit, with no shared communal areas.
- 4.5. **ACoP:** Documents approved by the Health and Safety Executive (HSE) that provide practical guidance on complying with legal duties. ACoPs have special legal status - in the event of a health and safety breach, duty holders must demonstrate how they have complied with the relevant ACoP.
- 4.6. **Duty Holder:** The Housing Plus Group as the legal entity that owns and/or manages premises and is therefore responsible under health and safety law for managing and controlling risks from Legionella. Strategic responsibility is exercised through the Director of Building Compliance and Safety, who acts on behalf of the Group to ensure compliance with this policy and the Legionella Management Plan (LMP).
- 4.7. **Legionella Water Risk Assessment:** assessment to identify and evaluate potential sources of Legionella risk within water systems
- 4.8. **Written Scheme of Control:** A documented risk management plan that outlines the specific control measures required to manage water systems and reduce the risk of Legionella exposure.
- 4.9. **Legionella Management Plan (LMP):** A comprehensive document detailing how water systems will be managed, including the activities and responsibilities necessary to ensure protection from Legionella risks.
- 4.10. **Legionella Control Association (LCA):** A voluntary membership organisation whose members must adhere to a defined Code of Conduct for the control of Legionella bacteria in water systems.

5. Roles and Responsibilities

- 5.1. **The HPG Board and Audit and Risk Committee** provide strategic oversight, ensure robust assurance frameworks are in place and monitor key compliance risks associated with water safety management.
- 5.2. **The Group Chief Executive and Executive Team** lead the organisation's compliance culture by securing necessary resources, setting expectations and championing performance standards.
- 5.3. **The Executive Director of Investment and Growth** acts as the senior sponsor and executive lead for this policy, ensures strategic alignment with broader asset and compliance frameworks and is the designated Health and Safety Lead in accordance with the Social Housing (Regulation) Act 2023.
- 5.4. **The Executive Director of Care and Support** holds responsibility for ensuring compliance with CQC regulations within regulated care settings under this policy, ensuring safe care and treatment in line with statutory requirements.
- 5.5. **The Director of Building Compliance and Safety** has responsibility for strategic ownership, oversight and performance management of this policy and the associated Legionella Management Plan (LMP). They also ensure that legal obligations and policy measures are met through effective leadership of compliance teams.
- 5.6. **Operational and team-specific responsibilities** are defined within the Water Hygiene Procedure Manual and corresponding job role descriptions. All staff and contractors are required to comply with this policy and associated legal obligations.
- 5.7. Residents must allow reasonable access for safety checks, report gas/HHW faults promptly and must not tamper with appliances or systems.

6. Applicable Legislation and Guidance

- 6.1. This policy supports compliance with the Regulatory Framework for Social Housing in England, including the Consumer Standards introduced by the Regulator of Social Housing from 1 April 2024, and aligns with the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.
- 6.2. The principal legislation underpinning this policy is the Control of Substances Hazardous to Health (COSHH) Regulations 2002 (as amended), which require employers and landlords to assess and control risks from hazardous substances, including Legionella bacteria.
 - 6.2.1. The key Approved Codes of Practice (ACoPs) and guidance relevant to this policy include:
 - 6.2.2. L8 – Legionnaires' Disease: The Control of Legionella Bacteria in Water Systems (HSE, 4th Edition)
 - 6.2.3. HSG274 Part 2 – The Control of Legionella Bacteria in Hot and Cold Water Systems
 - 6.2.4. BS 8580-1:2019 – Risk Assessments for Legionella Control
 - 6.2.5. HSG282 – Control of Legionella and Other Infectious Agents in Spa-Pool Systems (where applicable)
 - 6.2.6. HTM 04-01 – Safe Water in Healthcare Premises
- 6.3. This policy also operates within the context of the following legislation:
 - 6.3.1. Health and Safety at Work etc. Act 1974

- 6.3.2. Management of Health and Safety at Work Regulations 1999
- 6.3.3. Workplace (Health, Safety and Welfare) Regulations 1992
- 6.3.4. Personal Protective Equipment at Work Regulations 1992
- 6.3.5. Hazardous Waste (England and Wales) Regulations 2005 (as amended)
- 6.3.6. Construction (Design and Management) Regulations 2015
- 6.3.7. Defective Premises Act 1972
- 6.3.8. Landlord and Tenant Act 1985
- 6.3.9. Data Protection Act 2018
- 6.3.10. Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013

7. Delivery Programme

- 7.1. HPG will develop and maintain comprehensive water hygiene safety risk assessments. These assessments will identify key risks associated with water hygiene and outline the necessary mitigations to ensure safety.
- 7.2. HPG will maintain a programme of Legionella risk assessments for all properties with water systems that may pose a risk of exposure, reviewed at intervals appropriate to the level of risk.
- 7.3. Communal blocks will be assessed to determine water hygiene risks and included in the compliance programme where required.
- 7.4. HPG will establish and maintain a comprehensive register of all properties with an active written scheme of control for water hygiene. This register will also include data on the legionella risk assessments conducted for each property.
- 7.5. Inspection and monitoring records will be securely stored and managed in accordance with HPG's Data Retention Policy.
- 7.6. Unoccupied properties will be subject to risk-based control measures prior to re-occupation, as defined in the Water Hygiene Procedures Manual
- 7.7. Where access cannot be obtained for inspections or remedial works, HPG will follow established legal access and escalation processes to ensure customer safety.
- 7.8. HPG will maintain a scheduled maintenance programme for all water systems covered by a Written Scheme of Control, delivered by competent persons and supported by appropriate record-keeping, including inspection and cleaning of water storage systems where required by risk assessment.
- 7.9. Records of Written Schemes of Control and associated remedial works will be maintained in accordance with HPG's Data Retention Policy.
- 7.10. Monitoring and inspection results will be documented to provide evidence of compliance.
- 7.11. HPG will ensure that accurate records are kept on the qualifications of all consultants, surveyors, risk assessors, and engineers involved in water hygiene activities.
- 7.12. HPG will implement robust processes and controls to ensure the security and integrity of all data related to water hygiene safety

8. Follow-on Works

- 8.1. HPG will ensure that follow-on works identified through risk assessments or maintenance activities are prioritised, completed, and verified to maintain compliance and resident safety
- 8.2. HPG will maintain accurate records of all remedial works and water testing undertaken
- 8.3. Risk assessment outcomes will be categorised and managed in accordance with HSE guidance and the Legionella Management Plan (LMP).
- 8.4. Where systems are identified as high risk, HPG will implement immediate control measures to reduce the risk of exposure and restrict access until the system is confirmed safe.
- 8.5. Medium-risk systems will be subject to proportionate remedial actions and enhanced monitoring, in line with the LMP.
- 8.6. Where systems cannot be fully assessed, follow-up investigations will be arranged promptly, and interim risk controls applied until assessments are complete.
- 8.7. Low-risk systems will continue to be managed through routine monitoring and review.
- 8.8. If a risk assessment or inspection produces an incomplete or inconclusive outcome, HPG will apply proportionate interim controls and complete follow-up actions before re-occupation or works commence, as defined in the Water Hygiene Procedures Manual

9. Data and Records

- 9.1. While there is no specific legal requirement under ACoP L8 to provide Legionella risk information to customers of domestic premises, landlords and dutyholders have a legal responsibility under the Health and Safety at Work etc. Act 1974 and associated regulations to ensure the safety of residents, staff, contractors, and visitors from waterborne hazards.
- 9.2. In residential buildings with communal water systems (e.g. shared tanks, outlets, or showers), relevant information about the condition, risk level, and control measures must be made available to any person liable to be disturbed or exposed to the system—this includes maintenance staff, contractors, and emergency responders.
- 9.3. Sharing appropriate Legionella control information with customers, particularly in higher-risk or care environments, is considered best practice.
- 9.4. HPG will maintain accurate and verifiable records for all water hygiene activities, including risk assessments, testing, remedial works, and communications.
- 9.5. Under ACoP L8 and HSG274, all Legionella-related records—including risk assessments, control schemes, monitoring results, maintenance logs, and remedial actions—must be kept up to date and be readily accessible to those responsible for managing the risk.
- 9.6. Records will be retained in line with HPG's Data Retention Policy and relevant HSE guidance
- 9.7. The Competent Person or designated operational manager is responsible for ensuring data integrity and availability for compliance, audit, and regulatory purposes

- 9.8. All water safety management safety data is processed in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

10. Resident Communication and Engagement

- 10.1. Residents will be provided with adequate notice ahead of all scheduled surveys, reinspection's, or remedial works, in line with legal requirements and HPG's customer service standards.
- 10.2. HPG will ensure that water hygiene and Legionella management are routinely discussed within specialist and regulated housing or care settings, including those registered with the Care Quality Commission (CQC). These forums will support awareness, information sharing, and feedback to improve service delivery and maintain regulatory compliance.
- 10.3. Where HPG manages or supplies communal water systems, it will inform residents of any planned works, maintenance, or interruptions. Where issues originate from external water suppliers, HPG will coordinate with them to ensure residents are kept informed.
- 10.4. HPG will promote awareness and understanding of water hygiene and Legionella risk through accessible information and engagement activities as part of its wider compliance communications programme.
- 10.5. Resident engagement forums will be used to involve customers in the ongoing review and development of Legionella management practices, ensuring transparency, accountability, and continuous improvement in line with HPG's wider compliance strategy.

11. Competency and Training

- 11.1. All contractors undertaking Legionella-related work must be competent, qualified, and accredited in accordance with ACoP L8 and relevant industry standards. HPG will verify contractor competence through its approved supplier assurance processes
- 11.2. All staff involved in water hygiene management will receive role-specific training appropriate to their duties, with refresher training provided in line with HPG's Corporate Training and Competence Framework
- 11.3. All individuals carrying out Legionella control activities must be competent, trained for their specific tasks, and familiar with relevant procedures and safety requirements.
- 11.4. HPG will maintain and regularly review a competency and training matrix covering all roles involved in Legionella control activities to ensure continuing compliance, professional development, and assurance of competence.

12. Performance Monitoring

- 12.1. HPG will monitor and report the performance of its water hygiene compliance programme through key performance indicators and governance frameworks approved by the Executive Management Team and Board.
- 12.2. KPI definitions, targets, and reporting arrangements are maintained within the Water Hygiene Procedures Manual and the Compliance Performance Framework.

- 12.3. Performance data will be used to identify trends, inform decision-making, and support continuous improvement in water safety management.

13. Quality Assurance

- 13.1. HPG will operate a proportionate, risk-based quality assurance regime across water hygiene and Legionella management activities.
- 13.2. This will include internal audits, compliance reviews, and independent third-party verification where appropriate.
- 13.3. Audit scope, frequency, and methodology are defined within the Water Hygiene Procedures Manual and governed through the Group's Compliance Audit Programme.

14. Non-Compliance and Escalation

- 14.1. HPG will monitor compliance performance and escalate any cases of non-compliance or identified risk in accordance with internal governance arrangements to ensure timely resolution and accountability.
- 14.2. Escalation criteria, reporting thresholds, and corrective action processes are defined within the Water Hygiene Procedures Manual and aligned to the Group's Compliance Escalation Framework.
- 14.3. Significant compliance breaches or emerging risks will be reported to the Executive Management Team and Board in accordance with the Group's governance and regulatory reporting requirements.
- 14.4. Where a water hygiene incident or loss of utility has the potential to compromise the health, safety, or welfare of residents in a regulated care setting, HPG will ensure that appropriate notifications are made to the Care Quality Commission (CQC) in accordance with the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.

	Policy Control Sheet Water Safety Compliance Policy Policy reference number - 2025/022
Policy Author	David Nicholls – Director of Building Compliance and Safety Nick Pike – Resident Safety Manager
Direct Lead	David Hall Executive Director of Investment and Growth
Version	1.0 – December 2025
Target audience	Staff, tenants, service users, visitors, contractors and third-party providers
Consultation	Wrekin Voices Customer Partnership Panel Directors Operational Delivery Teams Executive Management Team Audit & Risk Committee
Date of Equality Impact Assessment	An EIA was completed on the 15 th January 2025
Date of Data Privacy Impact Assessment	Not required.
Approving Body	Executive Management Team (Delegated by the Group Board)
Date of final approval	18 th December 2025
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Monitoring arrangements	KPI's Health & Safety Compliance Teams Executive Management Team
Reporting	Executive Management Team – monthly Audit & Risk Committee – Quarterly HPG Board – Quarterly
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Policy category	Health and Safety
Associated policies and procedures	Building Safety Policy Corporate Health and Safety Policy Damp and Mould Policy Electrical Safety Policy Fire Safety Policy Legionella Management Plan Water Hygiene Procedures Manual Written Schemes of Control
Policy location	SharePoint HPG Hub Housing Plus Group website

Summary of changes table

Revision history			
Author	Summary of changes	Version	Authorised by & date
D.Nicholls & N.Pike	New HPG policy, bringing together the two legacy organisations approaches	1.0 - December 2025	Executive Management Team – 18 th December 2025