The Whiteley Homes Trust

Water Safety Management Policy

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EIA	Yes

Review Tracker

Review Date	Reviewed by	Changes Made	Approved by	Approved date	Version
July 2026	**Director of Operations / Head of Property & Compliance**	**Complete rewrite to align with current legislation, ACOP L8, Building Safety Act 2022, Social Housing (Regulation) Act 2023, current HSE guidance and the Regulator of Social Housing's Safety and Quality Standard**	**RECC** **Main Board**	**6/8/26** **15/9/26**	**2.0**

Introduction

At The Whiteley Homes Trust ("the Trust"), we are committed to providing homes, workplaces and communal facilities that are safe, well maintained and compliant with all statutory and regulatory requirements.

Safe management of water systems is fundamental to protecting residents, employees, volunteers, contractors and visitors from risks associated with waterborne pathogens, including *Legionella* bacteria, *Pseudomonas aeruginosa*, scalding from hot water systems and contamination of potable water supplies.

The Trust recognises that effective water safety management extends beyond compliance with legislation. It forms an integral part of delivering safe homes, protecting vulnerable residents, preserving our historic estate and fulfilling our responsibilities as a Registered Provider of Social Housing regulated by the Regulator of Social Housing.

The Trust is committed to adopting a proactive, risk-based approach to water safety through effective governance, competent management, planned inspection and maintenance, monitoring, resident engagement and continuous improvement.

This policy sets out how the Trust manages water safety across all premises and water systems for which it has responsibility. It establishes clear governance arrangements, defines responsibilities and describes the systems used to ensure compliance with legislation, regulatory standards and recognised industry best practice.

Scope of Applicability

This policy applies to all individuals engaged with The Trust, including employees, agency workers, bank workers and volunteers. Throughout this policy, these groups are referred to collectively as *"employees"* for clarity and ease of reference.

It also covers residents including beneficiaries, tenants in our private let homes and their households. Throughout this policy, these groups are referred to collectively as "residents" for clarity and ease of reference.

In addition, this policy extends to Trustees, third-party stakeholders, including contractors, suppliers, and external individuals or organisations that provide services on behalf of the Trust.

This policy applies to all buildings, premises and water systems for which the Trust has legal responsibility, including but not limited to:

- Independent living cottages
- Huntley House
- Offices
- Community buildings
- Commercial premises
- Plant rooms
- Boiler houses
- Domestic hot and cold water systems
- Communal water systems
- Cold water storage tanks
- Calorifiers
- Expansion vessels
- Thermostatic Mixing Valves (TMVs)
- Showers and shower heads
- Little-used outlets
- Drinking water systems

- Irrigation systems where applicable
- The Therapy Pool (supported by a separate Water Quality Management Procedure)
- Temporary water systems associated with construction or refurbishment projects

The Trust's responsibilities are determined by the relevant Licence to Occupy, tenancy agreement, lease or management agreement.

Where water systems fall outside the Trust's legal responsibility, the Trust will provide advice and guidance where appropriate to promote good water hygiene and safe management practices.

The Trust is committed to openness and transparency. By clearly defining the scope of this policy, we seek to promote understanding, accountability and confidence among residents, employees and stakeholders.

Purpose

The objectives of this policy are to ensure that:

- The Trust complies with all applicable legislation, Approved Codes of Practice, regulatory requirements and recognised industry standards relating to water safety.
- Risks associated with Legionella, other waterborne pathogens, contaminated water systems and hot water scalding are effectively identified, assessed, controlled and monitored.
- Safe hot and cold water systems are maintained throughout the Trust's housing stock, communal buildings and workplaces.
- Water safety forms part of the Trust's wider Building Safety, Asset Management and Health & Safety Management Systems.
- Suitable and sufficient Water Risk Assessments are undertaken and reviewed at appropriate intervals.
- Written Schemes of Control are implemented and maintained for all applicable water systems.
- Competent persons are appointed to undertake Water Risk Assessments, monitoring, inspection, testing and remedial works.
- Residents, employees, contractors and visitors are protected from avoidable water safety risks.
- Appropriate financial and operational resources are made available to maintain statutory compliance and manage water safety risks effectively.
- Performance is monitored through clearly defined Key Performance Indicators and reported regularly to the Executive Leadership Team, Resident Experience and Community Committee and Board.
- Residents receive clear information regarding water hygiene, Legionella prevention and their responsibilities for maintaining safe water systems within their homes.
- Continuous improvement is achieved through auditing, performance monitoring, learning from incidents and responding proactively to changes in legislation, regulation and recognised good practice.

This policy shall be reviewed at least annually, or sooner following:

- A confirmed case of Legionnaires' disease associated with Trust premises
- A significant water safety incident
- Changes in legislation, Approved Codes of Practice or guidance
- Recommendations arising from audits or investigations
- Significant refurbishment or alterations to water systems
- Organisational restructuring affecting management responsibilities

Legislative and Regulatory Framework

The Trust manages water safety in accordance with all relevant legislation, Approved Codes of Practice, British Standards, Health and Safety Executive guidance and regulatory expectations, including but not limited to:

Primary Legislation

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Control of Substances Hazardous to Health Regulations 2002 (COSHH)
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Housing Act 2004
- Homes (Fitness for Human Habitation) Act 2018
- Building Regulations 2010 (as amended)
- Building Safety Act 2022
- Social Housing (Regulation) Act 2023
- Water Supply (Water Fittings) Regulations 1999
- Public Health (Control of Disease) Act 1984

Approved Codes of Practice and Guidance

he Trust manages water systems in accordance with:

- Health and Safety Executive Approved Code of Practice L8 – *Legionnaires' Disease: The Control of Legionella Bacteria in Water Systems* (current edition)
- HSG274 Part 1 – Evaporative Cooling Systems
- HSG274 Part 2 – Hot and Cold Water Systems
- HSG274 Part 3 – Other Risk Systems
- HSE Guidance HSG282 *The Control of Legionella and Other Infectious Agents in Spa Pool Systems* (where applicable)
- Health Technical Memorandum (HTM) 04-01 *Safe Water in Healthcare Premises* (where applicable to Huntley House and care environments)
- NHS guidance relating to *Pseudomonas aeruginosa* where relevant
- British Standards and recognised industry guidance applicable to plumbing and water systems.

Regulatory Requirements

The Trust also manages water safety in accordance with the expectations of:

- Regulator of Social Housing – Safety and Quality Standard;
- Regulator of Social Housing – Transparency, Influence and Accountability Standard;
- Housing Ombudsman Complaint Handling Code;
- Health and Safety Executive (HSE);
- Care Quality Commission (where applicable to regulated services);
- Surrey County Council Public Health and Environmental Health requirements where applicable.

The Trust adopts the principles of the Health and Safety Executive's Approved Code of Practice L8 by ensuring that clearly identified Duty Holders, Responsible Persons and Competent Persons are appointed to manage water safety risks. These appointments are supported by defined responsibilities, appropriate training, adequate resources and regular performance monitoring to provide assurance that statutory duties are being effectively discharged.

The Trust recognises that effective water safety management is a fundamental component of providing safe, quality homes. The Board will receive regular assurance that water safety risks are effectively managed and that the Trust continues to meet its statutory landlord compliance obligations, supporting compliance with the Regulator of Social Housing's Safety and Quality Standard.

Governance and Assurance

The Trust recognises that effective water safety management is a critical component of landlord health and safety compliance and organisational resilience.

Water safety is therefore managed through a robust governance framework which includes:

- Clearly defined roles and responsibilities;
- Competent Responsible Persons;
- Planned inspection, monitoring and maintenance programmes;
- Independent Water Risk Assessments;
- Written Schemes of Control;
- Contractor competence assurance;
- Regular compliance reporting;
- Internal audits and independent reviews;
- Board oversight of statutory compliance and landlord safety performance.

Where legislation, Approved Codes of Practice or recognised industry guidance are revised, the Trust will review this policy and associated procedures to ensure continued compliance and adoption of best practice.

1. Roles and Responsibilities

1.1 Organisational Structure

The Trust's organisational structure for water safety is set out within the current organisational structure approved by the Board.

The Trust recognises the distinction between the **Duty Holder**, **Responsible Persons** and **Competent Persons** as defined within the Health and Safety at Work etc. Act 1974, the Control of Substances Hazardous to Health Regulations 2002 (COSHH), and the Health and Safety Executive's Approved Code of Practice L8 *Legionnaires' Disease: The Control of Legionella Bacteria in Water Systems*.
The Trust will ensure that individuals appointed to manage water safety have the appropriate authority, competence, training and resources to discharge their responsibilities effectively.

The Trust's arrangements include:

- The **Chief Executive Officer** as the organisational Duty Holder with overall accountability for water safety governance.
- Operational responsibility is delegated through **the Director of Operations**, supported by the Head of Property & Compliance.
- The **Head of Property & Compliance** as the Trust's designated Responsible Person for the operational management of water safety compliance and implementation of the Water Safety Management System.
- The **Head of Estates & Facilities** supporting the management of water systems serving communal buildings, external infrastructure and operational facilities.
- A suitably qualified **Health & Safety Adviser** providing competent independent advice on water safety legislation, risk management and continuous improvement.
- Competent specialist water hygiene contractors appointed to undertake Water Risk Assessments, monitoring, inspection, sampling, cleaning, disinfection and remedial works.
- Managers and employees undertaking water safety activities only where they have received appropriate training and have been assessed as competent to perform those duties.

The Trust adopts a "whole organisation" approach to water safety, recognising that effective management requires collaboration across all departments to protect residents, employees, volunteers, contractors and visitors.

The Trust will regularly review the competence of individuals undertaking water safety duties and will ensure that refresher training, continuing professional development and contractor performance monitoring are undertaken to maintain high standards of compliance.

Duty Holder - Chief Executive Officer (CEO)

The Chief Executive Officer holds overall accountability for ensuring the Trust complies with all statutory and regulatory requirements relating to water safety.

Whilst operational responsibilities may be delegated, overall accountability remains with the CEO.
The CEO is responsible for ensuring:

- This policy is implemented, adequately resourced and reviewed annually
- Effective governance arrangements are maintained for water safety management
- Competent responsible persons, duty holders and specialist contractors are appointed
- Sufficient financial and operational resources are available to maintain statutory compliance

- Significant water safety risks are escalated appropriately
- Water safety performance is reported regularly to the executive leadership team, resident experience and community committee and the Board
- the Board receives appropriate assurance that statutory landlord compliance obligations are being met.

Director of Operations (Health & Safety Officer)

The Director of Operations acts as the Trust's Health & Safety Officer and is responsible for providing strategic oversight of the Trust's Water Safety Management System.. Responsibilities include:

- Monitoring compliance with this policy
- Ensuring water safety is embedded within the trust's health and safety management system
- Overseeing water safety performance reporting
- Reviewing significant incidents, investigations and lessons learned
- Ensuring appropriate corrective actions are implemented
- Commissioning independent audits where appropriate
- Maintaining oversight of organisational water safety risks
- Reporting water safety performance, compliance and significant risks to the executive leadership team and Board

Head of Property & Compliance (Responsible Person)

The Head of Property & Compliance is the Trust's designated Responsible Person for water safety and has day-to-day responsibility for ensuring compliance with statutory duties relating to water systems. Responsibilities include:

- Maintaining the Trust's Water Safety Compliance Register.
- Ensuring suitable and sufficient Water Risk Assessments are undertaken by competent persons.
- Ensuring Water Risk Assessments are reviewed at appropriate intervals and following significant alterations, incidents or changes in use.
- Maintaining and implementing Written Schemes of Control for applicable water systems.
- Ensuring all statutory monitoring, inspection, testing and sampling programmes are completed within required timescales.
- Commissioning and managing specialist water hygiene contractors.
- Ensuring communal water systems, plant rooms, boiler houses, cold water storage tanks and associated infrastructure are maintained safely.
- Ensuring planned maintenance of water systems is completed in accordance with the Written Scheme of Control.
- Ensuring remedial works identified through Water Risk Assessments, monitoring or inspections are completed within agreed risk-based timescales.
- Maintaining accurate records of monitoring, inspections, sampling, certification and remedial works.
- Ensuring water safety compliance information is accurately recorded within the Trust's compliance management system.

- Ensuring contractor competence is verified and maintained.
- Ensuring temporary water supplies associated with construction or events are managed safely
- Reporting water safety performance, compliance and outstanding risks to the Director of Operations on a quarterly basis.
- Supporting investigations into confirmed or suspected cases of Legionnaires' disease or other significant water safety incidents.

Head of Estates & Facilities (Responsible Person - External Areas)

The Head of Estates & Facilities is responsible for the safe management of water systems and associated infrastructure located within the Trust's communal buildings, external estate and operational facilities. Responsibilities include:

- Reviewing and approving contractor Risk Assessments and Method Statements (RAMS) before water-related works commence
- Managing water safety risks associated with construction projects, planned maintenance and estate works
- Ensuring little-used outlets within communal buildings are identified and managed appropriately
- Supporting implementation of flushing regimes during void periods or building closures
- Reporting water safety defects or concerns promptly to the Head of Property & Compliance.
- Supporting investigations into water safety incidents and implementing lessons learned.
- Working collaboratively with the Head of Property & Compliance to ensure water compliance records remain complete and accurate.

Health & Safety Adviser (HSA) – Competent Person

The Trust's appointed Health & Safety Adviser acts as the competent person for water safety, providing independent professional advice and assurance.
The Health & Safety Adviser will, through the Director of Operations:

Head of Housing and Huntley House Registered Manager

Although the Housing Team is not responsible for statutory water safety compliance, it plays a vital role in supporting the effective management of water safety within residents' homes. Responsibilities include:

- Supporting access to residents' homes for Water Risk Assessments, inspections, monitoring and remedial works.
- Identifying and reporting water-related hazards or concerns raised by residents.
- Sharing relevant information regarding vulnerable residents where appropriate to support safe management arrangements.
- Supporting the management of prolonged void properties.
- Providing residents with advice and information on water hygiene, including reducing Legionella risks after periods of absence.

- Reinforcing resident responsibilities regarding safe use of water systems and reporting defects promptly. Supporting communication with residents during water safety incidents or planned maintenance.
- Carrying out weekly outlet flushing to void properties and little used outlets in Huntley House.

Heads of Departments (HODs)

Heads of Departments are responsible for ensuring water safety is effectively managed within the buildings, services and activities under their control.
Responsibilities include:

- Ensuring employees understand and comply with this policy and associated procedures.
- Supporting the implementation of Water Risk Assessments and Written Schemes of Control.
- Ensuring flushing regimes for little-used outlets within their buildings are completed and recorded where allocated.
- Ensuring defects relating to water systems are reported promptly.
- Supporting access for monitoring, inspection, sampling and remedial works.
- Ensuring employees receive mandatory water safety training where required.
- Supporting investigations into water safety incidents.
- Implementing agreed corrective actions within required timescales.
- Working collaboratively with the Property Team to minimise disruption during planned monitoring and maintenance activities.

As part of the HODs monthly meeting, the group will:

- Review water safety performance and compliance;
- Monitor completion of water risk assessments and written schemes of control;
- Review outstanding high-risk remedial actions;
- Consider lessons learned from incidents and audits;
- Escalate significant water safety risks to the executive leadership team and board where appropriate.

All Employees, Contractors & Volunteers

Everyone working for or on behalf of the Trust has a responsibility to contribute to maintaining safe water systems and to comply with this policy and associated procedures. Everyone must:

- Take reasonable care of their own health and safety and that of others;
- Comply with this policy and associated procedures;
- Report water leaks, temperature concerns, damaged outlets or other defects promptly;
- Report suspected water contamination or poor water quality immediately;
- Co-operate with water risk assessments, monitoring and maintenance activities;
- Complete mandatory water safety training where required;
- Never interfere with water systems unless authorised and competent to do so;
- Report any suspected cases of legionnaires' disease associated with trust premises immediately.

Contractors must:

- Comply with the Trust's Contractor Management Policy
- Provide evidence of competence
- Comply with approved RAMS and permit-to-work arrangements
- Provide all certification and monitoring records upon completion of works

Trustees

The Board of Trustees has overall responsibility for ensuring appropriate governance arrangements are in place to effectively manage landlord health and safety compliance, including water safety.
Trustees are responsible for:

- Promoting a positive culture of health, safety and compliance throughout the Trust
- Ensuring water safety risks are effectively identified, managed and monitored
- Receiving regular assurance regarding statutory water safety compliance
- Ensuring sufficient resources are available to maintain safe water systems
- Scrutinising performance and challenging areas of non-compliance
- Monitoring compliance with the Regulator of Social Housing's Safety and Quality Standard and relevant legislation
- Supporting continuous improvement through review of audits, incidents, resident feedback and lessons learned
- Ensuring water safety remains an integral component of the Trust's overall landlord compliance framework

2. Water Safety Management Plan

2.1 Water Safety Management System

The Trust operates a comprehensive Water Safety Management System designed to eliminate or reduce, so far as is reasonably practicable, risks associated with water systems under its control.

The Water Safety Management System is based upon the principles of continual improvement (Plan – Do – Check – Act) and integrates water safety into the Trust's wider Health & Safety Management System, Asset Management Strategy and Landlord Compliance Framework.

The Trust recognises that effective management of water systems is essential to protecting residents, employees, contractors, volunteers and visitors from:

- Legionella bacteria
- Pseudomonas aeruginosa (where applicable)
- Other waterborne pathogens

- Contaminated potable water
- Scalding from hot water systems
- Deterioration of water quality caused by poor system design or maintenance

The Trust will maintain suitable governance arrangements to ensure water safety risks are identified, managed, monitored and reviewed throughout the lifecycle of every building for which it has responsibility. The Water Safety Management System comprises:

- Clearly defined governance and accountability arrangements
- Competent responsible persons and specialist contractors
- Water risk assessments
- Written schemes of control
- Planned inspection, monitoring and testing programmes
- Water sampling and laboratory analysis where appropriate
- Planned preventative maintenance
- Remedial works programmes
- Incident investigation
- Resident communication
- Audit and assurance
- Board oversight and performance reporting

2.2 Objectives

The Trust's Water Safety Management Plan aims to:

- Protect residents and others from exposure to waterborne pathogens.
- Maintain safe hot and cold water systems throughout the Trust's housing stock and workplaces.
- Ensure compliance with all relevant legislation, Approved Codes of Practice and recognised industry guidance.
- Minimise disruption to residents through proactive planned maintenance.
- Ensure water systems are appropriately maintained throughout their operational life.
- Identify defects at an early stage to reduce the likelihood of system failure.
- Promote continuous improvement through regular review of performance and lessons learned.

2.3 Plan – Do – Check – Act

The Trust adopts the internationally recognised Plan – Do – Check – Act (PDCA) model for managing water safety.

Plan

The Trust will:

- Identify hazards associated with water systems
- Undertake water risk assessments
- Develop written schemes of control

- Allocate responsibilities
- Determine inspection frequencies
- Establish monitoring programmes
- Identify required resources

Do

The Trust will:

- Implement Written Schemes of Control
- Undertake inspection, testing and monitoring
- Complete flushing regimes
- Commission specialist contractors
- Undertake remedial works
- Maintain accurate compliance records
- Provide training

Check

The Trust will:

- Monitor compliance against KPIs
- Audit contractor performance
- Review Water Risk Assessments
- Investigate incidents
- Analyse trends
- Review compliance reports

Act

The Trust will:

- Implement lessons learned
- Update procedures
- Revise risk assessments
- Review training needs
- Improve maintenance programmes
- Report improvements to the Board

3. Water Risk Assessments

Suitable and sufficient Water Risk Assessments form the foundation of the Trust's Water Safety Management System.

Water Risk Assessments identify hazards associated with water systems, evaluate risks to residents, employees, contractors and visitors, determine the adequacy of existing controls and specify remedial actions required to reduce risks so far as is reasonably practicable.

Water Risk Assessments shall be undertaken by competent persons possessing the appropriate qualifications, experience and technical knowledge.

The Trust will ensure that Water Risk Assessments are completed for all premises where water systems fall within the Trust's legal responsibility. Assessments shall include consideration of:

- System design
- Water storage arrangements
- Temperatures
- Water turnover
- Dead legs
- Infrequently used outlets
- Vulnerable residents
- System cleanliness
- Scale and corrosion
- Maintenance arrangements
- Previous monitoring results
- Changes in occupancy

3.1 Review of Water Risk Assessments

Water Risk Assessments shall be reviewed:

- At intervals recommended by the assessor
- Following significant refurbishment or alterations
- Following changes in occupancy
- Following significant changes to water systems
- Following confirmed or suspected cases of legionnaires' disease
- Following significant water safety incidents
- Where monitoring indicates deterioration in control measures
- Where legislation or guidance changes

3.2 Water Risk Assessment Programme

The Trust adopts a risk-based approach to determining assessment frequencies.

Building Type	Typical Review Frequency
Huntley House	Annually
Community Buildings	Annually
Officers	Annually
Boiler Houses	Annually
Independent Living Cottage	Representative sample and desktop assessment, reviewed periodically or where significant changes occur

Temporary Water Systems	Before occupation and throughout project duration where required

Risk assessment frequencies may be increased where operational experience, system condition or resident vulnerability indicate a higher level of risk.

4. Written Schemes of Control

Where Water Risk Assessments identify a requirement, the Trust shall maintain a Written Scheme of Control for each applicable water system.

The Written Scheme of Control provides detailed operational instructions for maintaining water safety and ensuring risks remain effectively controlled.

Each Written Scheme shall include:

- Description of the water system
- Schematic drawings where appropriate
- Identified hazards
- Control measures
- Inspection frequencies
- Monitoring requirements
- Flushing arrangements
- Sampling programme
- Responsibilities
- Escalation arrangements
- Emergency procedures

Written Schemes shall be reviewed whenever:

- Water Risk Assessments are reviewed
- Significant alterations occur
- Monitoring identifies deficiencies
- Legislation changes
- System performance deteriorates

4.1 Control Measures

Typical control measures include:

- Temperature monitoring
- Flushing of little-used outlets
- Inspection of storage tanks
- Inspection of calorifiers
- Cleaning and disinfection
- Sampling
- Inspection of TMVs

- Replacement of shower hoses and heads
- Maintenance of strainers and filters
- Remedial plumbing works

All actions arising from Written Schemes shall be allocated an owner and completion date.

Progress shall be monitored through the Trust's compliance management system.

5. Water Monitoring, Inspection and Testing

The Trust operates a planned programme of monitoring, inspection and testing designed to verify that water systems remain under effective control. Monitoring frequencies are determined by:

- Water Risk Assessments
- ACOP L8
- HSG274
- manufacturer's recommendations
- system design
- building use
- resident vulnerability

Monitoring activities may include:

- Water temperature monitoring
- Inspection of storage tanks
- Inspection of calorifiers
- Flushing records
- Inspection of expansion vessels
- TMV servicing
- Visual inspections
- Microbiological sampling
- System disinfection
- Asset inspections

The Head of Property & Compliance shall ensure all planned monitoring activities are completed within required timescales.

Any overdue monitoring activity shall be investigated immediately.

Where monitoring identifies conditions outside acceptable parameters:

- The Responsible Person shall be notified
- Risk shall be assessed
- Corrective actions shall be implemented
- Additional sampling shall be undertaken where appropriate
- Residents shall be informed where necessary

6. Water Sampling and Laboratory Testing

Water sampling forms an important verification activity within the Trust's Water Safety Management System. Sampling shall be undertaken where required by:

- Water Risk Assessments
- Written Schemes of Control
- HSG274
- following incidents
- following disinfection
- where monitoring identifies abnormal conditions

Samples shall be analysed by laboratories accredited by the United Kingdom Accreditation Service (UKAS).

Sampling may include testing for:

- Legionella species;
- Pseudomonas aeruginosa (where applicable);
- Total viable counts;
- Other microbiological indicators where appropriate.

Where results exceed recommended action levels:

- The Responsible Person shall be informed immediately
- Risks shall be assessed
- Immediate control measures shall be implemented where necessary
- Additional sampling shall be undertaken
- Remedial works shall be commissioned
- The Written Scheme of Control shall be reviewed
- Findings shall be reported through the Trust's governance arrangements

All monitoring results shall be retained within the Trust's compliance management system to provide a complete audit trail and demonstrate ongoing compliance.

7. Prevention and Control Measures

The Trust will implement appropriate engineering, operational and management controls to minimise the risk of Legionella bacteria and other waterborne pathogens proliferating within water systems.

Control measures shall be proportionate to the level of risk identified through Water Risk Assessments and Written Schemes of Control.

7.1 Hot and Cold Water Systems

The Trust will ensure all hot and cold water systems are designed, operated and maintained to minimise the conditions that encourage bacterial growth. The Trust will, where reasonably practicable:

- Maintain hot water storage at temperatures that inhibit Legionella growth
- Maintain cold water below recommended temperatures
- Avoid water stagnation
- Remove redundant pipework ("dead legs")
- Maintain adequate water turnover
- Minimise stored water volumes where practical
- Ensure systems remain clean and free from excessive scale, corrosion and biofilm

7.2 Calorifiers

Calorifiers shall be:

- Inspected at frequencies identified within the Written Scheme
- Subject to temperature monitoring
- Periodically inspected internally where required by risk assessment
- Cleaned where inspection identifies excessive scale or debris

7.3 Cold Water Storage Tanks

Cold water storage tanks shall be:

- Inspected internally and externally at planned intervals
- Maintained in a clean condition
- Fitted with close-fitting lids and insect screens
- Adequately insulated where appropriate
- Protected from contamination

7.4 Thermostatic Mixing Valves (TMVs)

The Trust recognises the importance of balancing protection against Legionella with protection from scalding. TMVs shall be:

- Installed where identified by risk assessment
- Inspected and serviced at planned intervals
- Performance tested
- Replaced where found to be defective

7.5 Shower Heads and Flexible Hoses

Showers present an increased risk of aerosol generation. The Trust will ensure:

- Shower heads and hoses are cleaned, descaled or replaced in accordance with the Written Scheme of Control

- Replacement frequencies reflect resident vulnerability and risk assessment findings
- Records are maintained

7.6 Little-used Outlets

Little-used outlets shall be identified through Water Risk Assessments. Where flushing is identified as the appropriate control measure:

- Flushing shall be completed at frequencies defined within the Written Scheme
- Flushing records shall be maintained;
- Outlets shall be reviewed periodically to determine whether permanent removal is appropriate

7.7 Void Properties

Water systems within void properties shall be managed to prevent deterioration in water quality.
The Trust shall:

- Flush systems before occupation
- Undertake regular flushing where properties remain vacant
- Inspect stored water systems where applicable
- Recommission water systems before new occupation

7.8 Therapy Pool

The Therapy Pool operates under a separate Water Quality Management Procedure. The Trust will ensure:

- Microbiological monitoring
- Chemical dosing
- Operational inspections
- Specialist contractor support
- Compliance with relevant HSE guidance.

7.9 Irrigation Systems

Where irrigation systems are installed, they shall be designed and maintained to prevent contamination of potable water systems.

Appropriate backflow prevention devices shall be maintained in accordance with the Water Supply (Water Fittings) Regulations.

8. Contractor Management

Only competent contractors shall undertake work on water systems serving Trust premises. The Trust will ensure contractors:

- Demonstrate appropriate competence and experience
- Maintain relevant accreditation

- Hold appropriate insurance
- Provide suitable risk assessments and method statements (RAMS)
- Comply with ACOP l8 and HSG274
- Provide certification upon completion of works.

The Trust will monitor contractor performance through:

- Contract management meetings
- Compliance audits
- Review of performance data
- Periodic procurement reviews

9. New Build, Refurbishment and Alterations

Water safety shall be considered throughout the planning, design, construction and commissioning of new developments and refurbishment projects. Prior to handover, the Trust shall receive:

- Commissioning certificates
- Chlorination certificates where applicable
- Microbiological test results
- As-installed drawings
- Operating manuals
- Updated asset information

Where alterations affect existing water systems:

- Water Risk Assessments shall be reviewed;
- Written Schemes updated;
- monitoring programmes amended where required.

10. Resident Information and Responsibilities

Residents play an important role in maintaining safe water systems within their homes. The Trust will provide residents with information regarding:

- Flushing outlets following periods of absence
- Cleaning shower heads
- Reporting water quality concerns
- Reporting unusually hot water
- Recognising signs of potential water system defects
- Providing access for inspections

Residents should:

- Report leaks promptly
- Avoid interfering with communal water systems
- Allow reasonable access for inspections
- Notify the trust where homes remain unoccupied for extended periods

The Trust will communicate proactively during any water safety incident which may affect residents.

11. Training and Competence

The Trust is committed to ensuring employees possess the knowledge and competence necessary to manage water safety effectively. The Trust will ensure:

- Responsible Persons receive appropriate water safety management training
- Operational employees receive Legionella awareness training
- Managers understand their responsibilities under this policy
- Refresher training is undertaken periodically
- Contractor competence is verified

Training compliance shall be monitored through the Trust's Training Matrix.

12. Water Safety Incidents and Emergency Response

All water safety incidents shall be reported immediately. These include:

- Confirmed or suspected Legionnaires' disease
- Microbiological failures
- Loss of temperature control
- Contamination
- Significant system failures

The Trust shall investigate all significant incidents to identify:

- Immediate causes
- root causes
- corrective actions
- opportunities for improvement

Where required, the Trust shall notify:

- Health and Safety Executive
- UK Health Security Agency
- Local Authority
- Care Quality Commission (where applicable)
- Regulator of Social Housing where appropriate

13. Monitoring, Audit and Performance Review

The Trust will monitor water safety performance through a programme of:

- Statutory inspections
- Internal audits
- Contractor audits

- Compliance reporting
- Independent reviews
- Board assurance

Performance shall be reviewed at least quarterly by the Executive Leadership Team and reported to the Resident Experience and Community Committee and Board.

The Trust adopts the principles of continual improvement and will use audit findings, incidents, resident feedback and lessons learned to strengthen water safety arrangements.

14. Three Lines of Assurance

The Trust adopts a Three Lines of Assurance model to provide confidence that water safety risks are being effectively managed.

First Line – Operational Management

Operational assurance is provided through:

- Daily management of water systems
- Implementation of written schemes
- Planned inspections
- Flushing regimes
- Contractor supervision
- Compliance monitoring

Second Line – Independent Oversight

Independent assurance is provided through:

- Health & safety adviser
- Specialist water hygiene contractor
- Compliance reporting
- Contract management
- Internal audits

Third Line – Governance

Strategic assurance is provided through:

- Executive Leadership Team
- Resident Experience and Community Committee
- Board scrutiny
- external audit where commissioned
- regulatory inspection

This approach ensures that water safety risks are effectively governed, independently verified and continuously improved.

15. Policy Implementation and Review

This policy shall be communicated to all relevant employees and made available through the Trust's document management system.

Managers are responsible for ensuring local implementation and maintaining evidence of compliance. The Director of Operations shall review this policy at least annually, or sooner where:

- Legislation changes
- Guidance changes
- Significant incidents occur
- Audit findings identify improvements
- Organisational changes affect responsibilities

The Director of Operations is responsible for ensuring revisions are communicated throughout the organisation.

Appendix: Water Safety Monitoring Schedule.

Please set out in a table the specific frequencies for temperature checks, calorifier inspections, tank inspections, flushing, TMV servicing and microbiological sampling.