Policy title	**Water Hygiene Management Policy**
Summary	The aim of this policy is to ensure the safety from infection from water systems and installations for people living and working in properties, owned or managed by Mosscare St Vincent's (MSV)
Scope	This policy applies to all properties owned or managed by MSV.
Author & Job Role	Callum Jones – Director of Asset Strategy
Business Area	Homes – Asset Strategy
Document Status	Final V8.0
Document Reference	Homes – Asset Strategy/Water Hygiene Management Policy/2.0
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EIA completed **Other IAs completed**	14 September 2026 N/A
Consultation	Senior Leadership Team Compliance Team PTSG Water

Contents Page

1. **Introduction/Policy Purpose**
2. **Scope**
3. **Definitions**
4. **Roles & Responsibilities**
5. **Monitoring, Review & Evaluation**
6. **Related Documents**
   6.1. The Water Hygiene Management Plan (WHMP)
   6.2. Appendices 1-18
7. **Version History**
8. **Delivering the Policy/Procedure**
9. **Appendices**

1. Introduction & Policy Purpose

The overall aim of this policy, and the associated management plan, procedures and control documents, is to ensure the safety from infection from water systems and installations (including legionella bacteria) for people living and working in properties, owned or managed by Mosscare St Vincent's [MSV].

MSV aims to protect the occupiers of its properties, as well as other residents, visitors, staff, contractors and the general public, from the risks associated with water systems so far as is reasonably practicable.

This document sets out key policy objectives, control measures and accountabilities for reducing risk from water supply and installation systems.

The purpose of this policy is to ensure MSV meets its obligations under the following legislation:

- The Health and Safety at Work etc. Act 1974;
- The Management of Health and Safety at Work Regulations 1999
- Control of Substances Hazardous to Health (COSHH) Regulations (as amended) 2002
- The Housing Act 2004 which introduced the Housing Health and Safety Rating System (HHSRS) and the Housing Health and Safety Rating System Regulations 2005.
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- The Water Supply (Water Fittings) Regulations 1999 S I 1999
- The Water Supply (Water Fittings) (Amendments) Regulations 1999.

and recognises the following Approved Codes of Practice (ACoP) and guidance:

- Approved Code of Practice (ACOP) L8 – 'Legionnaires Disease: The Control of Legionella Bacteria in Water Systems' Approved Code of Practice.

- HSG 274 Part 2: The Control of Legionella Bacteria Hot & Cold Water Systems
- HSG274 Parts 3 The Control of Legionella Bacteria in Other Risk Systems
- BS 8580-1:2019 - Water Quality - Risk assessments for Legionella contro
- BS 8580-2:2022 Water quality - Risk assessments for Pseudomonas aeruginosa and other waterborne pathogens.

The application of this Policy ensures that MSV meets compliance with the outcomes of the Regulatory Framework for Social Housing in England introduced by the Homes and Communities Agency as outlined below:

(Registered Providers must) meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes)

2. Scope

This policy applies to all properties owned or managed by MSV.

3. Definitions

The key MSV policy objectives are:

1. Appoint a Responsible Person whose duty is to ensure the Water Hygiene Management Plan (WHMP) is in place to minimize the risk of legionella and to manage and monitor the necessary work systems and procedures.

2. Carry out a Portfolio Risk Assessment (PRA) for all assets owned or managed by MSV to identify, where practicable, buildings where conditions may be present that encourage legionella bacteria to multiply and\or disperse and assign the appropriate risk classification to these assets as defined in the WHMP.

3. Carry out a Legionella Risk Assessment (LRA) on the assets where required as defined in the WHMP to identify and resolve hazards relating to risk of infection.

4. Use the outcome from the LRA to arrange programmes of routine inspection and testing of water systems and equipment, including, where needed, a programme of modification to any deficient systems and equipment as defined in the WHMP.

5. Ensure that for dwellings left vacant for extended periods of time a suitable drain-down or flushing regime is put in place to prevent the potential build-up of risk conditions as defined in the WHMP.

6. Establish and keep up-to-date, a record of the water systems and installations, risk assessments, maintenance, inspection and testing (The “Register”).

7. Introduce an approach to ensuring risk information is provided to those affected including customers and stakeholders.

8. Annually review the job profiles, skills, knowledge and experience of those staff involved in the delivery of this policy and, where necessary, provide training so that they can deliver this policy.

9. Ensure all asset risk assessments incorporate backflow risk analysis in accordance with the fluid-category classifications outlined in BS EN 1717:2025+A1:2026, ensuring physical backflow prevention is in place to prevent cross-contamination.

4. Roles and Responsibilities

The accountabilities for implementation of this policy are as set out below:

1. The Chief Executive retains overall accountability for the implementation of this policy.

2. The Executive Director - Homes is responsible for overall policy implementation and ensuring that adequate resources are made available to enable the objectives of the policy to be met.

3. The Director of Asset Strategy & Director of Asset Operations is responsible for delivery of the key policy objectives as set out herein including designing and implementing procedures, staff training, and communication to customers.

4. The Head of Compliance and Building Safety is responsible for delivery of the key policy objectives as set out herein including designing and implementing procedures, staff training, and communication to customers.

5. The Head of Compliance and Building Safety is responsible for maintaining the Registers and accountable for achieving the targets associated with the key policy objectives.

6. The Head of Compliance and Building Safety is responsible for operational delivery, including the management of contractors carrying out routine maintenance, testing and remedial works and updating Registers as appropriate.

7. The Neighbourhoods & Independent Living Teams shall support asset management and contactors' teams in gaining access to carry out legionella related works and maintenance.

8. The Director of Asset Strategy is responsible for ensuring the policy is kept up to date with prevailing legislation and statutory obligations.

1. Monitoring, Review & Evaluation

The effectiveness of this policy will be monitored using a set of performance measure as below:

Measure	Target	Reporting Interval	Reviewed by
% of known risks which have been assessed	100%	Monthly	The Head of Compliance and

% assets which have been reviewed in accordance with level of risk and appropriate timescales	100%		Building Safety - Weekly The Director of Asset Strategy - Monthly Customer & Communities Committee and Board - Quarterly
% assets with all actions/ control measures completed within relevant timescales	100%		

Policy implementation will be reviewed:

1. Monthly by the Director of Asset Strategy via SLT.
2. At each Committee and Board meeting via the regular Asset Compliance report.
3. By the MSV external & internal audit teams, as required, and a report provided to the Audit & Risk Committee or Strategic Safety Forum.

The operational oversight of this policy will sit at the Strategic Safety Forum.

6. Related Documents

6.1. The Water Hygiene Management Plan (WHMP)
6.2. Appendices 1-18

7. Version History

Version	Date	Description/Summary	Status	Author
V1.0	06/06/2018	New policy launch – date of first approval.	Approved	Philip Glover
V2.0	09/14/2019	Annual review with minor revisions.	Approved	Callum Jones
V3.0	09/14/2021	Annual review with minor revisions.	Approved	Callum Jones
V4.0	09/14/2022	Annual review with minor revisions.	Approved	Callum Jones
V5.0	09/14/2023	Annual review with minor revisions.	Approved	Callum Jones
V6.0	09/14/2024	Annual review with minor revisions.	Approved	Callum Jones
V7.0	03/10/2025	New template with minor revisions.	Draft	Callum Jones

8. Delivering the Policy/Procedure

MSVs Water Hygiene Management Plan (WHMP) details the processes in which risks associated with water systems and equipment are managed. This document explains how MSV meet the requirements of this policy.

Its purpose is to clearly set out the management arrangements that have been put in place, identify the responsibilities of teams, individual staff members and contractor's personnel and clarify the core processes designed to ensure effective implementation.

This document must be followed by all employees, customers and stakeholders of MSV to understand the obligations placed upon them to maintain a safe environment within all properties owned or managed by MSV.

This plan demonstrates assurance that appropriate and proportionate controls are in place to identify, manage and mitigate risks associated with water hygiene including maintaining an up-to-date record of the written scheme of control.

9. Appendices

None.

10. Impact Assessments

Equality Impact Assessment (EIA)

Name of Policy	MSV Water Hygiene Management Policy	
Date of Assessment	14th September 2026	
Name & Role of Assessors	Callum Jones – Director of Asset Strategy	
What are the desired outcomes of the policy?	The overall aim of this policy, and the associated management plans and procedures and control documents is to ensure the safety from infection from water systems and installations (including legionella bacteria) for people living and working in properties, owned or managed by Mosscare St Vincent's Housing (MSV).	
Who are the main stakeholders in relation to the function?	MSV aims to protect the occupiers of our properties, as well as other residents, visitors, staff, contractors and the general public, from the risks associated with water systems so far as is reasonably practicable.	
Who will be consulted and what types of consultation will be carried out?	People & Talent, Compliance, Customer Services, Health & Safety, Property Care, Development, Asset Management. Agenda item for review and discussion at Strategic Health & Safety Steering Group along with individual consultation with leadership from each department.	
Summarise any evidence considered	SharePoint Link: Review Comments 2026	
Could the function have a differential impact on:		**What evidence exists to support your analysis?**
	Yes / No	
Race Consider language and cultural factors	Yes	MSV make use of customer vulnerability markers linked to dashboard icon information to identify and assist vulnerable or hard to reach customers and consider barrier to our services including language. Where it becomes apparent that customers require communication in a language other than English, such communication will be translated beforehand, or conversations held through Language Line.
Gender reassignment Consider people proposing to or have undergone a process of having their sex reassigned.	No	
Disability Consider physical, visual, aural impairment, mental, learning difficulties	Yes	Where it becomes apparent through the vulnerability markers that customers have learning difficulties or other impairments such as hearing or visual, MSV will accommodate their individual needs throughout the process.

Age Consider Elderly or young people	No	
Sexuality Either know or perceived	No	
Gender	No	
Religion or belief Consider religious or cultural observance including non-belief, practices of worship	Yes	Where it becomes apparent that customers hold specific beliefs, cultural considerations will apply both while carrying out home visits, and also during religious celebrations when arranging appointments. This includes considerations of cultural bathing practices while completing risk assessments.
Other protected or vulnerable characteristics: • marriage or civil partnerships • pregnancy or maternity?	No	

In what areas could the differential identified be considered to have an adverse impact in this function and what solutions will be introduced to overcome these adverse impacts?	Where it becomes apparent that customers require communication in a language other than English, such communication will be translated beforehand, or conversations held through Language Line. MSV will accommodate customers individual needs throughout the process when identified as having learning difficulties or other impairments such as hearing or visual, through vulnerability markers. For customers who hold specific religious beliefs, cultural considerations will apply both while carrying out home visits, and also during religious celebrations when arranging appointments.
In what areas could the differential identified be considered a positive impact in this function and what strategies will be introduced to safeguard and spread these positive impacts?	These functions will improve the customer experience to ensure the process is followed, understood and cause minimal adverse impact to the customer. This will be achieved through specific consideration of their individual needs. The differentials listed above have been put in place to enhance the safety of both general and vulnerable customers form the risks associated with Water Hygiene.
Which Action Plans have these solutions/strategies been transferred into?	The Water Hygiene Management Plan (WHMP) and associated appendices.
Who will be responsible for monitoring these Action Plans?	The Head of Building Safety & Compliance along with the Compliance Lead are responsible for monitoring these action plans.

Ratified by: SLT **Date: 16 October 2026**