



POLICY DOCUMENT

Water Hygiene Management Policy

POLICY TITLE:	Water Hygiene Management Policy
LEAD OFFICER:	Water Hygiene and Lift Compliance Officer
DATE APPROVED:	
APPROVED BY:	Board of St Leger Homes of Doncaster
IMPLEMENTATION DATE:	May 2026
DATE FOR NEXT REVIEW:	April 2029
ADDITIONAL GUIDANCE:	
TEAMS AFFECTED:	Repairs and Maintenance Building Safety and Compliance
THIS POLICY REPLACES:	Water Hygiene Policy 2019

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Document Control

Revision History

Date of this revision:	April 2026
Date of next review:	April 2029
Responsible Officer:	Water Hygiene and Lift Compliance Officer

Version Number	Version Date	Author/Group commenting	Summary of Changes
0.1	March 2023	Water Hygiene and Lift Compliance Officer/ M&E Team	This is a significant re-write of a previous policy. This is based on a compliance team review of existing policy arrangements reflecting current best practice and guidance.
1.0	May 2023	EMT/Board	Approved by EMT and Board.
1.1	April 2026	Water Hygiene and Lift Compliance Officer/ M&E Team	7.2 A short Narrative why we are not legally required to carry out six monthly Thermostatic Mixing Valves (TMV) servicing. Add in appendix 1 Water Management Process Map

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Policy Creation and Review Checklist

Action	Responsible Officer	Date Completed
Best practice researched (Housemark, HQN, Audit Commission, general websites)	Water Hygiene and Lift Compliance Office	January 2023
Review current practices from similar organisations	Water Hygiene and Lift Compliance Office	January 2023
Review customer satisfaction data from the area the policy relates to	Not applicable	
Review Customer complaints from the area the policy relates to	Not applicable	
Undertake customer consultation if applicable	Not applicable	
Staff consultation if applicable	Water Hygiene and Lift Compliance Officer	January 2023
Trade Union consultation if applicable	Not applicable	
Stakeholder consultation if applicable	Not applicable	
Equality Analysis carried out	Water Hygiene and Lift Compliance Officer/Health Safety and Compliance Manager	March 2023

NB. The above table must be completed on all occasions. The policy will not be accepted or approved by EMT without this information completed.

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1. Introduction

- 1.1 St Leger Homes of Doncaster have legal duties to ensure the safety of the homes which our customers live in. We manage a [legal register](#) to identify the relevant Legislations, Approved Codes of Practice (ACoPs) and guidance that are relevant to the organisation and monitor our compliance with these; including the consumer standards. Water Hygiene Management is included within this.
- 1.2 In addition to its legal responsibilities, St Leger Homes of Doncaster is also aware, and fully embraces, its moral duty to 'do the right thing', ensuring our employees, customers and other stakeholders are safe at work and not adversely affected by the activities we carry out.
- 1.3 The general Health and Safety duties and responsibilities can be found in the Health and Safety Policy.

2. Purpose

- 2.1 This Policy details the roles, responsibilities and actions that are required for Water Hygiene management in our properties to ensure our tenants, employees and the public are safe.

3. How the Policy Will Be Implemented

- 3.1 The policy will be implemented by ensuring that
 - Adequate resources are available to maintain standards in Water Management;
 - Legionella Risk Assessments are carried out in all relevant premises and are reviewed in line with the review programme;
 - Water Management training, instructions and information is provided to enable employees to perform their duties safely and efficiently,
 - Procedures are in place to enable employees to work safely by assessing risks and implementing and monitoring control measures;

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- Water Management related incidents are investigated in a timely manner to identify the immediate and underlying causes and the measures required to reduce or eliminate the likelihood of reoccurrence;
- Water Management performance is monitored for measuring improvements and providing assurances to relevant stakeholders.

4. Performance Measures, Targets and Triggers

- 4.1 St Leger Homes of Doncaster use C365 as a Compliance Management system. This allows the Water Hygiene and Lifts Compliance Officer to proactively monitor, measure and report on Compliance activities in real time.
- 4.2 The monthly safety and compliance performance report is the governance and assurance reporting tool for stakeholders.
- 4.3 Each Legionella Risk Assessment (LRA) completed, will be by an external contractor for independent purposes and the time frame thereafter for each property will be dependent on the Risk evaluation on the original LRA.
- 4.4 Actions will be created on St Leger Homes of Doncaster Compliance Management system (C365) once LRAs are uploaded. Each action will be closed down by the Water Hygiene and Lift Compliance Officer once completed by the Mechanical and Electrical Team and evidence is provided.

5. Roles, Responsibilities and Accountabilities

5.1 Board

- 5.1.1 The St Leger Homes of Doncaster Board has overall responsibility for approving this Policy, delegating responsibility for its implementation, monitoring its effectiveness at high level and receiving assurance of Compliance.

5.2 Leadership Team (Executive Management Team and Heads of Service)

- 5.2.1 The Leadership Team will appoint a Duty Holder (M&E Service Manager) who will ensure that sufficient resources and information are made available in order that Water Hygiene Management is maintained.
- 5.2.3 This will include the provision of sufficient instruction, training and supervision to St Leger Homes of Doncaster staff carrying out Water Hygiene Management work and other employees who use Water Hygiene appliances, to ensure Compliance within this procedure.

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5.3 Mechanical and Electrical Service Manager

- 5.3.1 The St Leger Homes of Doncaster Mechanical and Electrical Manager is responsible for maintaining the work undertaken to ensure it complies with Legislation, including having any relevant items covered by an examination schedule with records kept and sent to the Water Hygiene and Lift Compliance Officer. They must also ensure that all persons working on Water Hygiene systems are competent to do so.
- 5.3.2 The St Leger Homes of Doncaster Mechanical and Electrical Service Manager (or a nominated representative) will attend any applicable meetings as a means of engaging in discussion of Water Hygiene best practice, changes of Legislation and other relevant matters and report back and disseminate the information as required to St Leger Homes of Doncaster staff.

5.4 Building Responsible Persons

- 5.4.1 Building Responsible Persons shall liaise with the Facilities Management Officer and ensure that Water Hygiene safety standards are implemented and met on sites for which they are responsible, including the statutory inspection and testing. They must ensure formal visual inspections on items take place and are recorded and ensure defects are reported to the Facilities Management Officer. Building Responsible Persons must ensure that their responsibilities with regards to the building are carried out by authorised persons only.
- 5.4.2 Building Responsible Persons must regularly inspect the workplace they are responsible for and complete an inspection report. Any relevant Water Hygiene repairs must be reported to the Mechanical Team Leader and items within their areas of responsibility must be inspected and tested, and any faulty items taken out of service.

5.5 Mechanical Team Leader

- 5.5.1 Assess all tenders with the Water Hygiene and Lift Compliance Officer involving Water Hygiene work to ensure contractors who are engaged to undertake this work are competent to do so.
- 5.5.2 The Mechanical Team leader must ensure the safety of their teams in relation to Water Hygiene work by ensuring visual checks are carried out by users, and all examination schedules are adhered to. They must remove from use any defective or damaged equipment that is identified and arrange for its repair or disposal.
- 5.5.3 Ensure all equipment is calibrated adhering to regulations Approved Code of Practice (ACoP L8) when carrying out Water Hygiene duties.

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5.6 Health, Safety and Compliance Team

5.6.1 The Health, Safety and Compliance team shall provide support and advice to all levels in the organisation with respect to associated Water Hygiene standards and safety.

5.6.2 A Training Needs Analysis (TNA) will be undertaken by the Water Hygiene and Lift Compliance Officer in conjunction with the Organisational Development Team to ensure the training provided is suitable and sufficient to the activities being undertaken.

5.7 Water Hygiene and Lift Compliance Officer

5.7.1 The Compliance Officer – Water Management and Lifting Equipment;

- Is responsible for providing guidance and advice to employees, to ensure the requirements of this policy are implemented at all levels of the organisation;
- Will undertake the duties of the Responsible Person (RP) in relation to Water Hygiene compliance and manage up to date information relating to compliance risks including ensuring the operation and development of appropriate data management systems accurately recording all testing, inspection, and remedial works;
- Ensure servicing, testing and inspection process is fit for purpose and that the records and certification is appropriately recorded, validated and current;
- Lead on ensuring that all Water Hygiene inspection processes are carried out correctly and remedial/follow on works are undertaken on a risk basis;
- Ensure all associated equipment has cyclical and preventative maintenance schedules in place;
- Ensure all staff, including external contractors, are sufficiently competent and skilled in Water Hygiene safety and compliance;
- Be able to investigate and resolve any irregularities and non-compliance issues that may arise to a high standard;
- Translate strategy, policy and procedures relating to Water Hygiene compliance into objectives, KPIs, management information, and assist in production of report to boards and committees;
- Contribute towards the implementation and ongoing delivery of a comprehensive governance and performance monitoring framework for compliance safety;
- Develop and maintain a high level of personal expertise in Water Hygiene safety compliance Legislation;

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- Provide technical support and advice in relation to regulatory requirements to a range of audiences, particularly with regard to your assigned specialist area;
- Undertake audits on employees and Water Hygiene engineers as required;
- The organisation's Compliance team shall have responsibility for ensuring the maintenance of the Water Hygiene systems is undertaken and certification is provided
- Assess all tenders with the Mechanical Team Leader involving Water Hygiene work to ensure contractors who are engaged to undertake this work are competent to do so.

5.8 Contractors

- 5.8.1 Contractors must adhere to all relevant St Leger Homes of Doncaster Policy and Procedures while on site.
- 5.8.2 Contractors must work in accordance with HSG274 & ACoP L8 Guidelines and all other HSE regulations
- 5.8.3 Any actions created on LRAs must be documented with Photographic evidence for remedial action to be carried out.
- 5.8.4 All contractors should be trained and competent to a minimum of Water Hygiene 004 (WH004) and hold the correct certification to carry out any tasks they are performing on site. Certification must be presented to the Mechanical Team Leader and Water Hygiene and Lift compliance officer including Sub-Contractors before work is carried out.
- 5.8.5 All (LRAs) must be carried out, completed and returned to the Mechanical Team Leader and Water Hygiene Compliance Officer within the specified time frame agreed.

5.9 Voids & Homechoice

- 5.9.1 When any St Leger Homes of Doncaster Property becomes void all outlets must be flushed, shower heads changed and the water supply to the property isolated to eliminate the need for weekly flushing.
- 5.9.2 On re-letting tenants will be provided with a copy of the Water Management leaflet.

5.10 Employees

5.10.1

- Employees must comply with this policy and relevant procedures listed in 3.1, and visually inspect Water Hygiene items and carry out a dynamic risk assessment before work commences. If any defect or fault is found

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the item must be removed from use and it must be reported to their line manager immediately.

- No employee must alter or work on any Water Hygiene systems unless suitably trained and competent to do so.

6. Compliance Management Programme

- 6.1 All Legionella Risk Assessments will be reviewed based on the risk per building.
- 6.2 All modules are on a cyclical programme based on the policy principles stated in the Water Hygiene policy 7.0.

7. Policy Principles of Water Management

- 7.1 As responsible social landlords, St Leger Homes of Doncaster will minimize the risks associated with Water Hygiene safety and ensure that all safety duties are carried out.

St Leger Homes of Doncaster will;

- Carry out Weekly flushing of Infrequently used outlets as per the LRA
- Carry out Monthly Temperature monitoring and centralised recording on St Leger Homes of Doncaster Compliance Management system of all common areas
- Carry out bi annual tank inspections testing the ambient room temperature, inlet mains temperature and stored temperature taking any photographic evidence necessary and recording on the St Leger Homes of Doncaster Compliance Management system.
- Upon carrying out the monthly monitoring, any outlets fed via Thermostatic Mixing Valve (TMV) that are out of scope (35-43 degrees) will require reporting to the line manager for a service or replacement
- Annual Blowdowns of Unvented Cylinders and Direct Storage Water Heaters via the Drain valve located on the Hot water outlets for a minimum of 2 minutes or until water runs clear.
- Bi Annual expansion vessel flushing on any vessel over 30ltrs and positioned in a horizontal position.
- Ensure that all statutory tasks are undertaken on systems in a safe and controlled manner
- Appropriate training will be given to relevant staff
- All equipment must be visually inspected daily before use
- All equipment must be calibrated to the manufacturer's guidelines and all results passed on to the Mechanical Team Leader and the Water Hygiene and Lift Compliance Officer.

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7.2 As referenced in HSG274 with the requirement for TMV Type 3 servicing, there is no explicit legal requirement that mandates St Leger Homes (or any social housing provider) to carry out six-monthly TMV servicing *unless* the environment falls into a healthcare or high-risk setting.

8. Monitoring and Review

8.1 This policy will be reviewed every three years for accuracy and appropriateness and will take into account any Legislative changes or requirements.

8.2 Monitoring of the effectiveness of the Policy and Policy Principles is part of the governance framework and included within performance reporting.

9. Management Plan

Building Risk Level	Frequency
1	Every 2 Years
2	Every 3 Years
3	Every 5 Years

Risk Level	Type of Building	Frequency of Completing new LRA	By Who
1	<ul style="list-style-type: none"> All Residential and Communal tank fed outlets e.g. showers and cold drinking water 	Every 2 years Subject to desktop review Should there be any changes to the water system	External Contractor & Water Hygiene and Lift Compliance Officer (WHLCO)
2	<ul style="list-style-type: none"> All Residential and Communal unvented Hot water cylinders mains and tank fed 	Every 3 years Subject to desktop review Should there be any changes to the water system	External Contractor & WHLCO
3	<ul style="list-style-type: none"> All residential and Communal Combination Boiler and mains outlet fed 	Every 5 years Subject to desktop review Should there be any changes to the water system	External Contractor & WHLCO

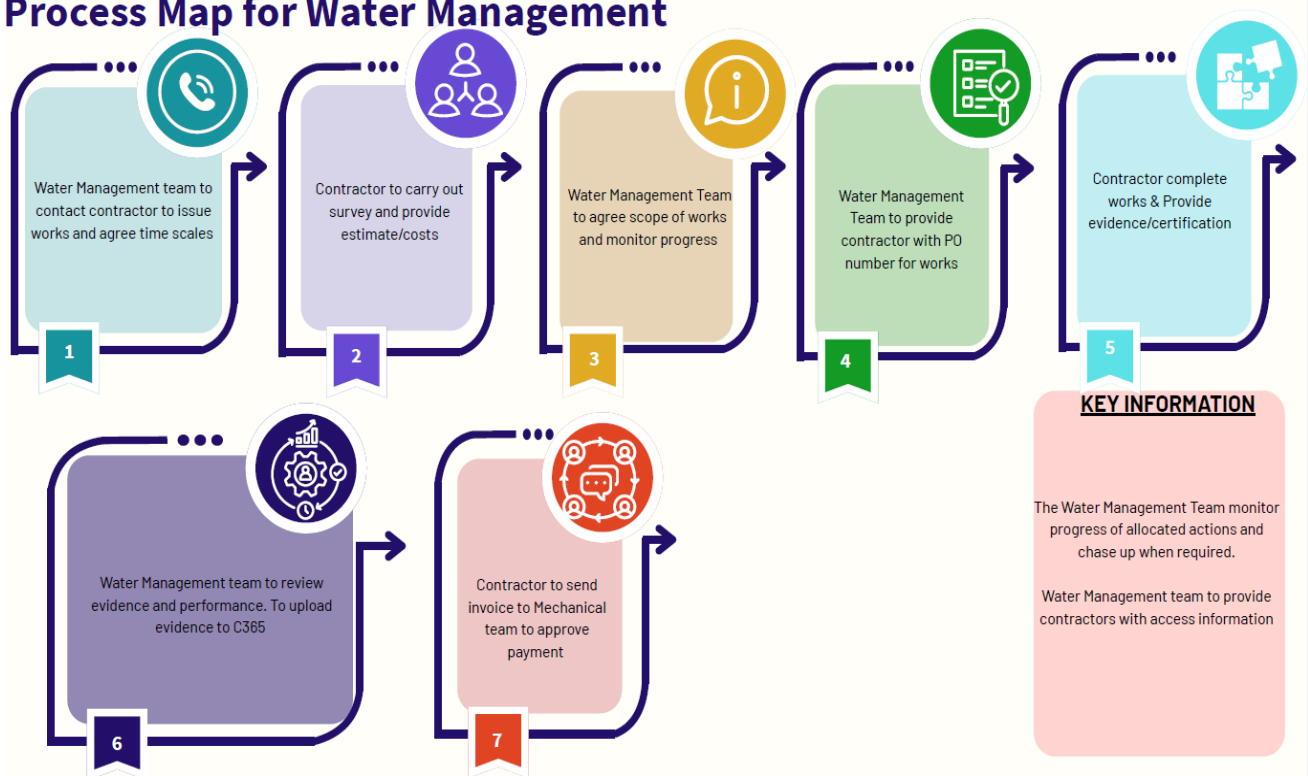
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Frequency	Job Description	By Who
Weekly	Flushing of all Seldom used outlets in all communal areas and offices as per the LRA	Water Hygiene Technician
Monthly	Monitoring of all Hot, Cold and sentinel outlets in all communal areas and offices. All TMV fed outlets should be tested at outlet before TMV and TMV temp. Scope 35-43	Water Hygiene Technician
Quarterly	Shower Clean and Disinfection of all Communal showers	Water Hygiene Technician
Bi-Annual	Carry out bi-annual tank inspections testing the ambient room temperature, inlet mains temperature and stored temperature taking any photographic evidence Bi Annual expansion vessel flushing on any vessel over 30ltrs and positioned in a horizontal position.	Water Hygiene Technician
Annual	Annual Blowdowns of Unvented Cylinders and Direct storage water heaters via the Drain valve located on the Hot water outlets for a minimum of 2 minutes or until water runs clear.	Water Hygiene Technician

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Appendix 1 – Process Map

Process Map for Water Management



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