



## Water Management Policy

<b>Date of approval</b>	September 2025 – Board Updated Mar 2026 with Board new strategic risks
<b>Responsible director</b>	Paul Butterworth Executive Director of Assets
<b>Policy monitoring body</b>	WCHG Board
<b>Resident input into policy</b>	Equality Impact Assessment Panel Review
<b>Date for policy review</b>	September 2028
<b>Linked strategies/policies</b>	Asset Management Strategy Repairs and Maintenance Policy Health and Safety Policy Compliance Framework Policy Continuous Performance Engagement Policy Growing Talent Through Professional Development
<b>Statutory and Legal Framework</b>	See Section 2
<b>Version/date</b>	Version 2 - July 2025

## Water Management Policy

### 1. Background

- 1.1. Wythenshawe Community Housing Group (WCHG/The Group) is committed to delivering all landlord responsibilities, including the maintenance and repairs to homes, communal blocks, and other properties we own and manage. This includes delivering services to provide the safe management of water storage tanks, in order to safeguard colleagues, customers, contractors and members of the public from contact with the legionella bacterium.
- 1.2. The Water Management Policy supports delivery of the Groups' strategic plan and is specifically linked to the Great Places strategic theme. This includes the building safety and compliance objectives to ensure customers live in safe, well maintained, and compliant homes.

### 2. Legislation, Guidance, Regulatory Standards and Sanctions

- 2.1. **Legislation** – The principal legislation applicable to this policy is:
  - The Health and Safety at Work etc. Act 1974 (HSWA)
  - The Management of Health and Safety at Work Regulations 1999
  - Reporting of Injuries Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR)
  - Workplace (Health, Safety & Welfare) Regulations 1992
  - Health & Safety (Safety Signs & Signals) Regulations 1996
  - Control of Substances Hazardous to Health Regulations 2002 (COSHH)
  - Water Supply (Water Fittings) Regulations 1999
  - Public Health Infectious Diseases Regulations
  - BSi PD 855468:2015 – Guide to flushing and disinfecting of services supplying water for domestic use within buildings and their curtilages
- 2.2. **Approved Code of Practice (ACoP)** -applicable to this policy is:
  - L8 – Legionnaires' disease (The control of legionella bacteria in water systems) Approved Code of Practice and guidance on regulations
  - HSG274 Part 2 – Legionnaires' Disease (The control of legionella bacteria in hot and cold water systems)
  - BSRIA Guide BG57/2016 – Legionnaires' Disease – Risk Assessment
  - BSRIA Guide BG58/2015 Legionnaires' Disease – Operation and Maintenance Log Book
  - BS 7592:2022 – Sampling for Legionella bacteria in water systems – code of practice
- 2.3. **Guidance** - The principal guidance applicable to this policy is:
  - BS 8580-2:2022 – Water Quality Risk Assessments for Pseudomonas aeruginosa and other waterborne pathogens. Code of Practice
  - BS EN 806: Parts 1-5 incl. - Specifications for installations inside buildings conveying water for human consumption

- BS 8558:2015 – Guide to the design, installation, testing and maintenance of services supplying water for domestic use within buildings and their curtilages – Complementary guidance to BS EN 806

2.4. **Regulatory Standards** - We will comply with the Regulator of Social Housing's regulatory framework and consumer standards for social housing in England. The Safety and Quality Standard is the primary one applicable to this policy.

### 3. Risk Management

- 3.1. The WCHG Board annually review the Corporate Risk Register and agree the risk appetite for each one.
- 3.2. The WCHG Audit and Risk Committee is responsible for overseeing the management of corporate risks associated with this policy.
- 3.3. The Health and Safety Committee are responsible for overseeing the implementation of this policy that is designed to mitigate the risks associated with this policy.
- 3.4. The Dev. & Homes Committee have strategic monitoring responsibility for the Asset Management Strategy which this policy supports and delivers pillar 2 – Building Safety & compliance.
- 3.5. The Head of Assets & Head of Repairs are responsible for the day-to-day management and mitigation of risk.
- 3.6. The specific risks associated with this policy are:

**SR2 - Death, Serious Injury or Harm:** Fail to ensure we effectively protect our customers, WCHG colleagues and visitors. Board Appetite – **Averse**

**SR3 - Regulatory Standards, laws, legislation and compliance:** Non-compliance with regulatory standards, laws and legislation. Board Appetite – **Averse**

**SR8 - Asset quality, repairs and building safety:** Failure to effectively manage asset quality and building safety. Board Appetite - **Averse** (but open to innovation)

- 3.7. The risk appetite set by the Board is 'Averse', defined as 'Avoidance of risk wherever possible; preference for safe, compliant, and controlled approaches. The key focus of the Board is that regulatory compliance continues to be achieved, and the Regulator of Social Housing's Standards and Consumer Standards are met.
- 3.8. We will maintain a suite of procedures and processes, and provide adequate resources to implement them, to mitigate the risk of service delivery failing to adhere to this policy. An operational risk register with controls will underpin these strategic risks.

### 4. Scope

4.1. This policy covers the following assets:

- Communal blocks
- Empty homes
- Homes and guest rooms within Sheltered or extra care schemes
- Community centres
- WCHG offices

4.2. This policy applies to:

- All WCHG colleagues
- All contractors and third parties working on our behalf.

4.3. This policy does not apply to:

- Other domestic dwellings
- The Woodhouse Park Lifestyle Centre

## 5. Commitments and obligations

5.1. Under this policy WCHG will undertake all activity to meet our obligations set out in Section 2.

5.2. It covers the flushing of water management systems to control the risk of waterborne bacterium.

5.3. We will ensure that all Planned Preventative Measures are completed within the month that they are due. The list of these and the frequency at which they are done is shown in Table 1.

**Table 1**

<b>Planned Preventative Measures</b>	<b>Frequency</b>
Risk Assessment Review	Annual
Water Risk Assessment	Five Years
Chemical Sample - M8 Closed System	Six Monthly
Cold Water Storage Tank (CWST) Tank Clean*	Three Years
CWST Tank Inspection	Annual
CWST Temperature Check –Incoming & Remote	Annual
Temperature Monitoring	Monthly
Expansion Vessel Flush	Annual
Showers	Quarterly
Internal Inspection Of Calorifier	Annual
Thermostatic Mixing Valve Check	Annual
Log Book Review	Annual

5.4. \*Water storage tanks will be cleaned every 3 years as a minimum. If sampling identifies any issues then reactive cleans will be undertaken.

5.5. Frequencies identified above may be adjusted if a Water Risk Assessment for a specific building/site indicates otherwise.

## 6. Significant Non - Compliance and Escalation

6.1. WCHG defines significant non compliance as any incident that has the potential to result in a possible breach of legislation or regulatory standard; or causes a risk to health or safety, and needs to be managed as an exception to routine processes and procedures.

6.2. All non-compliance issues will be reported and escalated as soon as possible, and no later than 24 hours after the incident occurred, or of an WCHG employee becoming aware of it.

6.3. Any non-compliance issue identified at an operational level will be formally reported to the Executive Director of Assets, who will agree an appropriate course of corrective action with the Contract Manager (Facilities) and report details of the same to the H&S Manager & Group Leadership Team (GLT).

6.4. In cases of serious non-compliance, GLT and the WCHG Board will consider whether it is necessary to engage the Regulator of Social Housing as required by the regulatory framework, or any other relevant organisation such as the Health and Safety Executive.

6.5. We will investigate and manage all RIDDOR notifications submitted to the Health and Safety Executive in relation to water safety, and will act to address any issues identified or lessons learnt, to prevent a similar incident occurring again.

## 7. Quality Assurance

7.1. WCHG will ensure that the programme of Planned Preventative Measures is delivered in line with legislation.

7.2. We will conduct an internal audit of all relevant documentation. This will be undertaken by the Facilities Officer who has had the relevant training for Water Management.

## 8. Performance Measurement, Monitoring and Review

8.1. We will use a range of key performance indicators (KPI) to monitor and report performance against water management. These include metrics that follow the requirements set out in the Tenant Satisfaction Measures (TSMs), specifically **TSM BS04** Homes for which all required legionella risk assessments have been carried out.

8.2. We will annually report performance against the TSM's to the Regulator of Social Housing, in accordance with the definitions set out in Regulatory Guidance.

8.3. The WCHG water management performance will be reported internally as follows:

Monitoring Body	Frequency
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WCHG Board	Every meeting – bi monthly
Leadership Team	Every Meeting - monthly
H&S Committee	Quarterly
CX Committee	Every meeting – bi monthly

8.4. Performance reporting to all monitoring bodies will be a snapshot position on the last day of the month. Access to live daily data is available to all colleagues with strategic and operational responsibility for water management safety, through our performance management system.

8.5. The measures reported will include but are not limited to:

**Data - The total number of:**

- WCHG Properties split by category (domestic, communal, commercial/others).
- Properties on programme split by category.
- Properties not on programme.
- Properties with a valid Risk Assessment.
- Properties without a valid Risk Assessment.
- Properties due to be serviced within the next 30 days.
- Follow on work arising from the programme (in time and overdue)

**Management Commentary to explain:**

- Current position.
- Corrective action required.
- Progress with completion of follow-up works.

**9. Customer Engagement**

9.1. We recognise the need to provide customers with effective communications to support our delivery of water management safety. We will use a range of mechanisms to maximise customer access for inspections including letters, phone calls and one to one support for vulnerable and hard to reach customers. In most cases, the systems are accessed through communal areas and communal plant rooms.

9.2. We will also share information clearly and transparently, and make it available to customers through regular newsletters and our external website to ensure customers are informed of the risks and preventative maintenance to control risks.

**10. Roles and Responsibilities**

10.1. The WCHG Board is responsible for setting and approving the priorities of this policy and ensuring it is fully implemented to ensure full compliance with legislation and regulatory standards. They will formally review and approve it every three years or sooner if there is a change in legislation or regulation.

- 10.2. The Leadership Team are responsible for monitoring that compliance against this policy is being achieved.
- 10.3. The Health and Safety Committee receive and review performance data related to the delivery of this policy and report to the Audit and Risk Committee. The Audit and Risk Committee review assurance reports on the delivery of this policy.
- 10.4. The Customer Experience Committee receive and review performance data related to the delivery of this policy.
- 10.5. The Executive Director of Assets has strategic responsibility for the management of Water Management and ensuring compliance is achieved and maintained. They oversee the implementation of this policy.
- 10.6. The Executive Director of Assets has been appointed as the Health and Safety Lead under the requirements of the Social Housing Regulation Act 2023.
- 10.7. The Head of Assets and Building Safety is responsible for the operational delivery, management and monitoring of this policy.
- 10.8. The Contract Manager (Facilities) has operational responsibility for the management of Water Management Safety and the delivery of these programmes.
- 10.9. The WCHG appointed contractor is responsible for the delivery of services within the scope of this policy.

## **11. Competence, Training and Professionalism**

- 11.1. WCHG is committed to realising the capability and potential of colleagues by investing in them through learning, training and professional study. Line managers will use the WCHG Continuous Performance Engagement process to ensure that mandatory training and required qualifications are maintained and kept up to date for all colleagues involved in the delivery of this policy
- 11.2. Our Board is recruited to meet the requirements of the governance skills matrix to ensure appropriate strategic control and oversight is provided across the Group's operations. Members receive regular and ongoing training to ensure skill and competency levels are maintained.
- 11.3. The Executive Director of Assets and the senior management team holds the Chartered Institute of Housing Level 5 Diploma in Housing, or equivalent.
- 11.4. The Contract Manager (Facilities) must be a competent and experienced person in dealing with contracts. The Facilities Officer will hold the relevant training required to run the contract.
- 11.5. We will check our contractors hold the relevant qualifications and accreditations when we procure them, and thereafter on an annual basis; we will evidence these checks and each contractor's certification appropriately.

11.6. We will have an annual communal licence in place to monitor the contractors effectively.

11.7. We will deliver training on this policy and its supporting procedures through mechanisms including but not limited to:

- Team Meetings
- One to one meeting
- On the job training
- Toolbox talks.

## **12. Data Protection**

12.1. Any personal data collected under this Policy will be treated with respect and used in line with the data protection laws - the UK General Data Protection Regulation (UK GDPR) and Data Protection Act (DPA) 2018. For further information on how we handle your personal data, and how you can exercise your information rights, please visit our Group Privacy Notice (not sure how to link it! <https://www.wchg.org.uk/privacy-notice/>)

## **13. Equality Diversity and Inclusion**

13.1. WCHG will ensure that the Water Management Policy and procedure is accessible to it all customers. WCHG recognises that customers of all races, ages, religions, gender, sexual orientation, literacy levels and disability should be treated equally and fairly. We will make every reasonable effort to ensure that no-one is discriminated against directly or indirectly on the basis of any protected characteristic as defined by the Equality Act 2010.

13.2. We recognise that some protected groups may be disproportionately impacted and will take additional steps in the application of this policy and make reasonable adjustments to ensure compliance with the Act. For example WCHG will:

- Provide a tailored response to the Water Management policy according to individual circumstances.
- Provide support to residents who have difficulty in managing their tenancy due to mental health issues, learning disabilities, physical disabilities, special needs or old age.
- Provide information on request, in languages other than English, in Braille, Large Print and Audiotape where required. In addition, our receptions and interview rooms are fitted with a hearing loop system.
- (This policy can be provided in a different format, translated, large print, easy read, braille, or an audio copy. Requests can be made by contacting us by phone on: 0300 111 0000 or by email: [inclusionanddiversity@wchg.org.uk](mailto:inclusionanddiversity@wchg.org.uk).)