Water Management Policy

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Approval Level	Southway Wythenshawe Board
Resident Input	CX Committee
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1. What this policy is for

1.1 This policy sets out Southway Wythenshawe Homes's commitment to managing water systems safely as a landlord and employer. It explains the standards, governance and assurance arrangements we will use to protect customers, occupants, colleagues, contractors, visitors and other people who may be affected by Legionella bacteria or other waterborne hazards.

1.2 We will identify relevant water systems, assess risk, put suitable controls in place, and keep records of all water management activity.

1.3 The water management procedures explain how the commitments in this policy will be put into practice.

2. Who this policy applies to

2.1 This policy applies to Southway Wythenshawe Homes colleagues, Board and committee members, contractors, consultants and suppliers whose work may affect, or be affected by, water management. It also protects residents, visitors and members of the public.

Area	**Application**
Communal blocks and plant areas	Communal water systems and associated plant under our control.
Empty homes	Water systems in empty homes before and during re-letting activity.
Sheltered and extra-care schemes	Homes, guest rooms and communal systems within sheltered or extra-care schemes.
Community and workplace buildings	Community centres, offices and other buildings owned, managed or occupied by Southway Wythenshawe Homes or its subsidiaries where we control the relevant water system.

3. Regulation and Legal Requirements

3.1 This policy supports compliance with the following legislation, regulation and recognised guidance:

- 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.
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.
- Workplace (Health, Safety and Welfare) Regulations 1992.
- Construction (Design and Management) Regulations 2015.
- Water Supply (Water Fittings) Regulations 1999.
- Social Housing (Regulation) Act 2023 and the Regulator of Social Housing consumer standards, including the Safety and Quality Standard.
- Building Regulations and applicable Building Standards Regulations.
- HSE Approved Code of Practice L8, Legionnaires' disease: the control of Legionella bacteria in water systems.
- HSG274 Part 2, control of Legionella bacteria in hot and cold water systems.
- Applicable British Standards, Public Health Infectious Diseases Regulations, and industry guidance for water-quality risk assessment, sampling, design, installation, operation and maintenance.

4. Risk Management

4.1 The Board will review the corporate risk register annually and agree the risk appetite for water-safety compliance. The current risk appetite is 'Averse' meaning the avoidance of risk is a key organisational objective.

4.2 The Audit and Risk Committee will oversee corporate risks associated with this policy.

GP2 Failure to meet asset compliance in line with regulatory standards.

4.3 We will maintain water management procedures and adequate resources to reduce the risk of non-compliance.

4.4 Actions, deadlines, responsible owners, interim controls and evidence of closure will be recorded in an auditable system.

5. What we will do

Water risk information and records

- Identify properties and water systems that may present a risk.
- Maintain accessible and auditable records of assessments, inspections, testing, servicing, remedial work and other control activities.
- Make relevant water-safety information available to colleagues, contractors and others who need it.
- Handle personal data in line with the UK General Data Protection Regulation, the Data Protection Act 2018 and our data-protection policies.

Risk assessments and controls

- Undertake water risk assessments and review them at the appropriate frequency.
- Implement, manage and monitor the controls identified by water risk assessments.
- Use competent people and contractors with the skills, knowledge, experience and capacity needed for their duties.
- Maintain water management procedures.

Planned preventative measures

- Complete planned preventative measures within the month in which they are due and In line with recommended frequency, unless a risk assessment supports a different frequency.

Planned preventative measure	**Frequency**
Risk assessment review	Annual
Water risk assessment	Five years
Chemical sample, M8 closed system	Six-monthly

Cold-water storage tank clean	At least every three years, with reactive cleaning where sampling identifies issues
Cold-water storage tank inspection	Annual
Cold-water storage tank temperature check, incoming and remote	Annual
Temperature monitoring	Monthly
Expansion-vessel flush	Annual
Shower control activity	Quarterly
Internal inspection of calorifier	Annual
Thermostatic mixing-valve check	Annual
Logbook review	Annual

Residents and building users

- Provide residents with clear communication about water-safety risks, inspections and preventative maintenance.
- Take account of residents individual support needs, provide accessible information and reasonable adjustments when required.
- Provide information through a range of channels, including newsletters and our website and ways for residents to question or raise concerns, including complaints through the Southway Wythenshawe Complaints Policy

Contractors and third parties

- Define water-safety responsibilities in contracts and other formal arrangements.
- Check competency of contractors through qualifications, accreditations and performance.
- Monitor performance and escalate non-compliance through contract governance and safety arrangements.

6. Escalation

6.1 Significant non-compliance means a potential legal or regulatory breach, a health and safety risk, or a matter requiring management outside routine processes.

6.2 Operational non-compliance must be formally reported to the Executive Director of Homes and Property. They will agree corrective action with relevant building safety leads and ensure the Executive Board is updated.

6.3 Significant matters will be considered for escalation to the Audit and Risk Committee and Board.

6.4 For serious non-compliance, the Executive Board, and Board will consider disclosure to the Regulator of Social Housing, Health and Safety Executive, or another relevant body.

6.5 Applicable RIDDOR events will be investigated and lessons acted upon.

6.6 A significant incident, material regulatory change or evidence of control failure will trigger consideration of an early policy review.

7. Quality Assurance

7.1 We will update operational teams regularly so that legal, regulatory and policy requirements remain understood and reflected in delivery.

7.2 Competent independent or external assurance will be used where proportionate to assess water-management processes.

7.3 Audits and assurance reporting will identify gaps, overdue items, corrective action and evidence of completed work.

7.4 Lessons from incidents, complaints, audits, regulatory activity and customer feedback will inform improvement.

8. Equality, Diversity and Inclusion

8.1 An Equality Impact Assessment has been completed on 6th October 2026 Its actions are recorded in the table below.

Action	Policy change or control	Owner	Status
Continue to provide accessible information and offer reasonable adjustments as required	NA		In place

9. Who is responsible

Officer or body	Responsibility
Board	Approve the policy and priorities, oversee implementation and receive assurance on compliance and risk.
Executive Board	Monitor compliance, resources and significant non-compliance.
Health and Safety Committee	Review detailed delivery data, exceptions and corrective actions and report through to the Audit and Risk Committee.
Audit and Risk Committee	Oversee corporate water-management risk and review assurance reports.
Customer Experience Committee	Review customer impact, engagement and relevant service performance.
Executive Director of Homes and Property	Provide strategic oversight, ensure compliance is maintained and escalate significant matters.
Head of Assets and Building Safety	Lead operational delivery, management and monitoring.
Facilities Contract Manager	Manage the programme, records, plans, contractors and day-to-day compliance.
Health and Safety Manager	Non-compliance reporting to Health and Safety Committee.
Managers and team leaders	Ensure teams understand the policy and maintain required competence.
All colleagues	Follow approved procedures and report concerns promptly.
Contractors, consultants and suppliers	Meet legal, contract, competence and information requirements and follow approved controls.

10. Competence and Training

10.1 Line managers will ensure mandatory training and required qualifications remain current for colleagues delivering this policy.

10.2 Board and committee recruitment and development will support the governance skills needed for strategic oversight.

10.3 People managing water safety must have knowledge, skills, qualifications and experience proportionate to their responsibilities. Specifically:

- The Executive Director of Homes and Property and the senior team will hold the Chartered Institute of Housing Level 5 Diploma in Housing or equivalent.

10.4 Role-specific technical qualifications or training will be provided to colleagues who manage water safety.

10.5 Managers engaging contractors must check and retain evidence of relevant qualifications, accreditations, experience and insurance during procurement and at least annually thereafter.

10.6 Training may include formal learning, team meetings, one-to-one meetings, on-the-job training and toolbox talks.

11. Monitoring and Reporting

11.1 We will monitor delivery through agreed indicators and assurance information. This includes but is not limited to:

Area	Minimum information
Risk assessments and planned measures	Due, completed and overdue assessments, inspections, tests and preventative measures.
Risk actions	Open, overdue and extended actions, risk priority, interim controls and evidence of closure.
Data quality	Reconciliation, exception checks and validation of water-safety records.

Incidents and escalation	Incidents, RIDDOR decisions, investigations, corrective action, lessons and regulatory contact.
Customer experience	Information, support, reasonable adjustments, access issues, complaints and learning.
Competence and contractors	Training completion, qualifications, accreditations, audit findings and performance concerns.
Independent assurance	Internal audit and external technical review.

11.2 Water management performance will be internally reported as follows. Frequencies must be confirmed before approval.

Monitoring Body	**Frequency**
Board	Every meeting – bi monthly
Executive Board	Every Meeting – bi-monthly
Customer Experience Committee	Every meeting – bi monthly

11.3 We will report the Tenant Satisfaction Measure for homes where required Legionella risk assessments have been carried out, in line with current regulatory definitions.

11.4 The policy will be reviewed at least every three years, or sooner following a material change in law, regulation, risk, organisational responsibility, serious incident or assurance finding.

12. Glossary

Term	**Definition**
ACoP	Approved Code of Practice.
Competent person	A person with sufficient skills, knowledge, experience and capacity to carry out their assigned duties.
COSHH	Control of Substances Hazardous to Health Regulations.
CWST	Cold-water storage tank.

Legionella	Bacteria that can cause Legionnaires' disease and related illness when suitable conditions allow growth and contaminated droplets are inhaled.
Non-compliance	A potential or actual breach of law, regulation or policy, or a health and safety risk requiring management outside routine arrangements.
Planned preventative measures	Scheduled inspections, tests, monitoring, cleaning and controls to prevent or reduce water-safety risk.
Reasonable adjustment	A change made to remove or reduce disadvantage for a person.
RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.
Water Management procedures	The controlled arrangements, responsibilities, controls and records used to implement this policy.
Water risk assessment	An assessment of water-system hazards, people at risk and required controls.