



EDEN HOUSING ASSOCIATION LIMITED

WATER HYGIENE POLICY

Document Reference Number:	CORP 29
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Approved By:	Executive Team
Approved Date:	22 May 2026
Policy Implementation Date:	17 July 2026
Revision Cycle:	3 Years (or if legislation changes)

This policy applies to Eden Housing Association and all its wholly owned subsidiaries, including Mitre Housing Association

Actual Month Review was carried out	Ernie Updated

1. POLICY STATEMENT

The aim of this document is to define a policy for the control and management of legionella bacteria in water systems within the dwellings and office buildings owned and managed by Eden Housing Association Ltd.

When visiting, working or living in and around EHA premises it is essential that the risk of exposure to legionella bacteria is minimised and strictly managed and controlled.

This policy is intended to ensure that Eden Housing Association meets its legal duties to manage the risk from legionella under the Health and Safety at Work etc. Act 1974 and associated regulations, including the Control of Substances Hazardous to Health Regulations 2002 (COSHH) and the Management of Health and Safety at Work Regulations 1999 (MHSWR). Compliance will be supported by applying the HSE Approved Code of Practice and guidance L8 and the HSE technical guidance HSG274.

Eden Housing Association recognises its general duty to protect the health and safety of residents, employees, contractors and visitors who may be affected by its undertakings. All staff, consultants and contractors are expected to cooperate with this policy and associated procedures to ensure risks from water systems are effectively controlled.

The scope of properties involved in EHA's water hygiene policy are:

- Offices
- Extra Care Schemes
- Supported Housing Schemes
- Other buildings where residents share a common cold-water storage tank or a common calorifier.
- Void Properties.

This document is to be read in conjunction with operational procedures relating to Water Hygiene management.

2. REFERENCES

Internal

- Health & Safety Policy
- Equality and Diversity Policy
- Written Schemes
- Water Hygiene Risk Assessment

External

- HSE Approved Code of Practice and guidance: *Legionnaires' disease – The control of legionella bacteria in water systems* (L8)
- Health and Safety at Work etc. Act 1974 (HSWA)
- Control of Substances Hazardous to Health Regulations 2002 (COSHH)

- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Management of Health and Safety at Work Regulations 1999 (MHSWR)
- Notification of Cooling Towers and Evaporative Condensers Regulations 1992 (NCTEC) (where applicable)
- HSE technical guidance HSG274 (Parts 1–3): *Legionnaires' disease: Technical guidance*
- BS8580-1:2019 (Risk Assessments)
- BS7592:2022 (sample taking)

3. POLICY CONTENT

Eden Housing Association will manage and control the risk from legionella in accordance with its legal duties under the Health and Safety at Work etc. Act 1974 and associated regulations, in particular the Control of Substances Hazardous to Health Regulations 2002 (COSHH) and the Management of Health and Safety at Work Regulations 1999 (MHSWR). The HSE Approved Code of Practice and guidance *Legionnaires' disease: The control of legionella bacteria in water systems* (L8) and HSE technical guidance HSG274 set out the recognised practical measures for compliance. The purpose of these requirements is to manage the risk from legionella to employees, residents and visitors to EHA premises and requires dutyholders to:

- Identify and assess the risks of legionella bacteria in water systems
- Devise a scheme for eliminating or controlling the risk at each facility.
- Manage the risk, selection and training of competent personnel
- Keep up to date records (electronically and using log books on site)
- Ensure that manufacturers, suppliers, installers and users address their responsibilities.

3.1 The above requirements will be met by the following actions:

- External Risk Assessment to be carried out by a competent contractor every 2 years.
- Written schemes devised for each facility.
- Bacteria Sampling when required.
- A robust inspection/ servicing schedule (See Appendix 1)
- Method Statements for Voids

3.2. CUSTOMER INVOLVEMENT AND ACCESSIBILITY

Customers will be kept informed of what measures they can take to help themselves via our electronic Newsletter. A legionella awareness leaflet is available to customers upon request.

When we have cleaning/disinfection of communal facilities, we will enable tenants in the affected building to have their equipment (e.g. showerhead) professionally cleaned/disinfected. This would be a chargeable service.

3.3 Value for Money (VFM)

Managing the risk from legionella is a requirement under health and safety legislation. Actions to reduce the likelihood of people's health being affected by legionella will be proportionate to the level of risk and the cost of reducing or removing that risk.

3.4 PROCEDURE

For each site, the Legionella Risk Assessment and associated 2-part Written Scheme are to be read as procedural documents, informing day-to-day management of water hygiene. The Written scheme to act as a 'live' document, with any material amendments or changes of personnel recorded, along with any in-house and third-party activities not recorded on the contractor portal.

3.5 Repairs/ Follow On works

Only WRAS approved parts and materials will be used on the water systems across the organisation.

4. RESPONSIBILITIES

Eden Housing Association's Chief Executive is the overall dutyholder.

For the purposes of this policy, the 'dutyholder' is the organisation (and its senior management) in control of the premises and the water systems, with duties to assess and manage legionella risk. Eden Housing Association may delegate day-to-day tasks to named postholders and competent contractors but retains overall accountability for ensuring suitable and sufficient arrangements are in place.

The Director of Operations retains overall responsibility for the implementation of this policy, ensuring procedures relating to the operational delivery of the policy are authored, maintained and implemented.

Responsibility of the management of the contracts and works relating to Water Hygiene are delegated to the Property Compliance & Facilities Manager.

5. EQUALITY IMPACT ASSESSMENT (EIA)

The EIA form is located in Appendix 1.

6. TENANT ENGAGEMENT IMPACT ASSESSMENT (TEIA)

The TEIA form is located in Appendix 1.

7. MONITORING & REVIEW

The policy will be monitored in line with H&S performance reporting to Audit & Risk Committee, this will include:

- Volume of risk assessments which have past review date and no action completed. This should be zero
- Works required from Risk Assessments which have not yet been completed within agreed timeframe.

The policy will be reviewed every three years, or when regulatory or organisational changes require an earlier review.

Equality Impact Assessment (2.7.25)

Question	Response
1. Summary of aims and objectives of the policy/practice/activity	To set out procedures for the prevention of Legionellosis and related conditions via approved control measures
2. What involvement, consultation, engagement has taken place for the policy/practice/activity (e.g relevant groups/stakeholders)	<i>Refer to Tenant Engagement Assessment</i>
3. Who is affected by the policy/practice/activity (consider Armed Forces/Veterans)	EHA staff, residents of sheltered schemes, tenants and the wider visiting public.
4. What are the arrangements for monitoring and reviewing the impact of the policy/practice/activity	<i>Refer to Revision Cycle on Front Page of document</i>

Protected Group	Is there a potential for a positive or negative impact	Action to address the impact
Disability: includes physical, sensory, neurodiversity, learning disabilities, mental health conditions / communication methods / range of support needed to participate / hearing loops or interpreters / accessibility – venue, location, transport	Yes – small potential for negative impact (Thermostatic mixing valves (TMV's) are fitted in some sheltered flats as a scald-risk precaution. Lower limits for legionella control are close to upper limits for scald risk, so there is potential for conflict)	Regular strip-down servicing of all TMV's in communal facilities is built in to site specification.
Gender reassignment: (transgender) people should be about to disclose their gender identity without fear or prejudice	No	
Marriage or civil partnership: all couples or partners, regardless of gender, should be able to access services	No	
Pregnancy or maternity: consider flexible hours of service or project / is there access to private are for breastfeeding, milk storage etc. / returning to work considerations	No	
Race: includes ethnicity, nationality and GRT communities. Consider the size of the BME communities that your service or project affects / languages spoken and understood / culture such as hygiene, clothing physical activities, mixed gender activities	No	
Religion or belief: consider dates and times of events in relation to religious practices and festivals / the diversity within the communities that your service or project affects / prayer times, meal times, food	No	

cultural habit or belief, religious holidays such as Ramadan		
Sexual orientation: consider LGB+ people should feel safe to disclose their sexual orientation without fear of prejudice	No	
Sex (gender): consider the impact on different genders / childcare and dependents care / mixed or single gender groups or activities / timing of services	No	
Age: consider the way younger and older people access services differently / use of technology / childcare or dependents care / transport arrangements / venue location	Yes – slight	As per Disability, elderly and frail tenants are more likely to require scald risk management.
Rurality: consider if there is a disproportionate impact on tenants living in rural localities	No	

Question	Explanation	
Is it possible the proposed policy/practice/activity could discriminate or unfairly disadvantage people	No	
Decision	Tick the relevant box	Include any justification required
1. No barriers identified and no change required – proceed	X	
2. Barriers identified towards one (or more) protected groups – adapt or change the policy/practice/activity to remove any barriers. This will better advance equality and/or foster good relations		
3. Barriers identified towards one (or more) protected groups – stop . There are adverse effects which cannot be prevented / mitigated		
4. Barriers identified towards one (or more) protected groups – no proportionate way to amend the policy/practice/activity so proceed with caution .		

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Action (To be completed as required)

If the evaluation has resulted in Decision 4, complete a risk assessment and record on Operational Risk Register	Date Completed:
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Tenant Engagement Assessment – is engagement with tenants necessary?
(1.7.25)

Impact	Tick relevant box	Note any details / justification
No Impact on current tenants – you can proceed without engagement, explaining why.	X	
Direct or indirect impact on current tenants. Stop! Identify who will be affected i.e. all tenants or a specific group.		

Influence	Tick relevant box	Note any details / justification
No influence for tenants – i.e. wholly legislative – you can proceed without engagement, explaining why.	X	
Possible influence on areas of policy/ practice/ activity impacting on tenants – stop. Arrange engagement with EIO		
Best place for influence is the practical delivery of the policy – through procedure. Please summarise approach for procedure review		

Summary of engagement (To be completed as required)

Tenant group impacted and engaged (i.e. all/ sheltered)	
Consultation method	
Summary of engagement	
Key themes/ implications	

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If you would like some assistance to work through this engagement assessment, please contact Jenny Webb – EIO.

Health & Safety Policy Review Assessment

Question	Additional information	
Does this policy/practice/activity address any Health & Safety practices?	yes	
What is the key legislation related to this policy?	Health and Safety at Work etc. Act 1974 (HSWA); Control of Substances Hazardous to Health Regulations 2002 (COSHH); Management of Health and Safety at Work Regulations 1999 (MHSWR); Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) and, where applicable, the Notification of Cooling Towers and Evaporative Condensers Regulations 1992 (NCTEC). Supporting HSE ACOP/guidance: L8 and HSG274.	
Is the policy a control of a corporate or operational risk register? (if yes name risk)	ORR-44 ORR-44: Legionella – illness or loss of life to a tenant or employee may be caused if procedures are not followed, leading to reputational damage and interruption to business while investigating.	
Tick groups/ departments who require knowledge of this policy		
	All staff	
	ICT	
	Finance	
	Housing Options	
	Housing	x
	Customer Services	
	Property	x
	HR	
	Governance	
	Assisted Living	x
	Contractors	
	Tenants	
Risk to tenants	Tick the relevant box	Additional Information
1. Are there additional measures required to reduce risk level to tenants.	No	
2. Has that risk been assessed?	Yes	
3. No Health & Safety implications	No	
4. Does it require tenant visibility?	No	If yes – upload to website

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All assessments completed by:	Author: Joanne Crone Date: 18/05/2026
All assessments reviewed by:	Reviewer(s): Executive Team Date: 22 May 2026
Will these assessments be published?	Completed assessments are appended to each policy. Any appropriate public related policies are uploaded to the EHA website