



POLICY DOCUMENT

Group Member: Progress Housing Group

Service Area: Property Services Compliance

Document Ref No: GRPOLPS05

Subject Title: Water Hygiene Policy

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1. INTRODUCTION

1.1 The Group must control the risks of legionellosis (a collective term for diseases caused by legionella bacteria) by introducing measures which reduce and/or control the risk of legionella growth and proliferation of legionella bacteria and other organisms in the water systems and reduce, so far as is reasonably practicable, exposure to water droplets and aerosol in non-domestic and domestic stock as required. This will reduce the possibility of creating conditions in which the risk from exposure to legionella bacteria is increased.

2. SCOPE OF THE POLICY

- 2.1 The Group has established a policy which meets the requirements of the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999 (the Management Regulations). In addition to this, the policy provides assurance that measures are in place to demonstrate compliance with the Control of Substances Hazardous to Health Regulations 2002 (as amended) and to identify, manage and/or mitigate risks associated with hot and cold water systems and any other systems that may cause exposure to legionella bacteria. The approved code of practice, L8 (“Legionnaires’ disease. The control of legionella bacteria in water system”), is available to duty holders to provide practical guidance on how to comply with their legal duties in relation to legionella.
- 2.2 The Group also ensures compliance with water hygiene legislation is formally reported at Senior Leadership Team (SLT) and Board level, including the details of any non-compliance and planned corrective actions.
- 2.3 The policy applies to all companies within the Group and therefore is relevant to all employees, tenants, contractors and other persons or other stakeholders who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services.
- 2.4 It should be used by all to ensure they understand the obligations placed upon the Group to maintain a safe environment for customers and employees within the homes of each customer, and within all communal areas of buildings and ‘other’ properties (offices, commercial shops etc.) owned and managed by the Group.

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3. RESPONSIBILITY

3.1 Key Roles and Responsibilities

- 3.1.1 In order to ensure that this Water Hygiene Policy, and the supporting Water Hygiene Procedure are adhered to, the Group will appoint suitably competent personnel to act as the 'Responsible Person' on behalf of the individual Duty Holder and oversee the implementation and review of these documents.
- 3.1.2 **Appointed Duty Holder** – The Director (Property Services) will fulfil the role of the appointed 'Duty Holder' on behalf of the Group in order to ensure the appropriate management of the risks associated with Water Hygiene. As a result, the Director (Property Services) will hold responsibility for the implementation of this document, and supporting procedure, as well as ensuring compliance is achieved and maintained.
- 3.1.3 Although the organisation has an appointed Duty Holder, the Group's Chief Executive will be ultimately responsible for ensuring compliance with current legislation and to ensure that the organisation fulfils its duties and responsibilities as outlined in this policy document and the supporting Water Hygiene Procedure.
- 3.1.4 **Responsible Persons** – The Head of Compliance, and the Compliance Manager (Asbestos, Water & Radon) shall ensure that there are suitable arrangements in place for the implementation of the Water Hygiene Policy, as well as overseeing the delivery of the agreed survey inspection programmes and the prioritisation and implementation of any works arising from the surveys.
- 3.1.5 The Board will have overall governance responsibility for ensuring the Water Hygiene Policy is fully implemented to ensure full compliance with the regulatory standards, legislation and approved codes of practice. As such the Board will formally approve this policy and review it periodically. The policy will be reviewed every three years (or sooner if there is a change in regulation, legislation or codes of practice).
- 3.1.6 The Board will receive quarterly updates on the implementation of the Water Hygiene Policy and compliance performance along with notification of any non-compliance

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issue which is identified. This is so they have the assurance that the policy is operating effectively in practice.

- 3.1.7 SLT will receive monthly reports in respect of water hygiene performance and ensure compliance is being achieved. They will also be notified of any non-compliance issue identified.
- 3.1.8 The housing teams will provide key support in gaining access into properties where access is proving difficult and use standards methods to do so. They will also facilitate the legal process to gain access as necessary.

3.2 Competent Persons

- 3.2.1 The Group will ensure that the Compliance Manager (Asbestos, Water & Radon) is appropriately competent; holding a recognised qualification in legionella control through the completion of a certified training course designed to meet the training needs of a 'duty holder' or 'responsible person' for legionella control. If the competent person does not have appropriate qualifications already, these should be obtained as soon as reasonably practicable.
- 3.2.2 Training includes courses by BOHS (British Occupational Hygiene Society) such as P901 – Management and control of building hot and cold water services, City and Guilds, CIBSE, or HABC around the requirements of ACoP L8 - 'Legionnaires' disease: The control of legionella bacteria in water systems'.
- 3.2.3 The Group will ensure that only suitably competent consultants and contractors, registered members of the Legionella Control Association (LCA) or equivalent, are procured and appointed to undertake risk assessments, prepare written schemes of control and undertake works in respect of water hygiene and legionella control.
- 3.2.4 The operational team with responsibility for delivery will check the relevant qualifications of employees working for these contractors to ensure that all persons are appropriately qualified for the work that they are carrying out. These checks will be undertaken on an annual basis and evidenced appropriately.

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4. POLICY

4.1 Obligations

- 4.1.1 The Control of Substances Hazardous to Health Regulations 2002 (as amended) (COSHH), the Management of Health and Safety at Work Regulations 1999 and the Health and Safety at Work Act 1974 place a duty, as an employer or person in control of a premises (e.g. a landlord), to take suitable precautions to prevent or control the risk of exposure to legionella.
- 4.1.2 The Group as the 'Duty Holder' as defined by ACOP 8 is responsible for Health and Safety and must take the right precautions to reduce the risks of exposure to Legionella, including understanding how the organisation will:
- Identify and assess sources of risk
 - Manage any risks
 - Prevent or control any risks
 - Keep and maintain the correct records
- 4.1.3 The Group must ensure there is a risk assessment undertaken for all hot and cold water systems, cooling plant and any other systems that can produce water droplets to establish any potential risks and implement measures to either eliminate or control the identified risks.
- 4.1.4 The Group is responsible for control of legionella and water hygiene safety must appoint a competent/responsible person to take managerial responsibility for legionella control - risk assessment, production of a written scheme and implementation of that scheme to prevent or control the risks. A competent person is someone with sufficient authority, competence, necessary skills, knowledge of the system and experience. The Group will ensure that properties are risk assessed by a competent person for potential to cause exposure to legionella.
- 4.1.5 Also, the 'Duty Holder' will appoint an authorised deputy responsible person who will provide cover to the responsible person in their absence. The deputy responsible person will be trained, instructed, and informed to the same level as the responsible person, and they will assist in the frequent monitoring of the control scheme(s).

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4.2 Policy Statement

- 4.2.1 The Group acknowledges and accepts its responsibilities about water hygiene safety and preventing exposure to legionella.
- 4.2.2 The Group will hold accurate and up to date records against each property it owns or manages setting out the requirements for water hygiene risk assessments and safety checks.
- 4.2.3 The Group will periodically review risk assessments no later than the review date set by the Legionella Risk Assessment. Where a system is identified as more likely to change (and is therefore a higher risk), the risk assessment will be reviewed on a more frequent basis, dependent on the determined level of risk. The Group will ensure that a 'written scheme of control' is developed and fully implemented for all properties risk assessed as requiring controls to adequately manage the risk of legionella exposure. The schemes will be assessed by the Group's competent person as high, medium or low risk.
- 4.2.4 The Group will ensure that a risk-assessed approach for water hygiene safety is adopted as part of the void standard when carrying out works on void properties before re-letting. These checks will be applicable on all void properties prior to commencing works which may affect the hot and cold water systems and that any identified risk control measures are fully implemented where identified.
- 4.2.5 The Group will ensure that a sample audit is undertaken of a minimum of 5% of all written schemes of control by an independent third-party consultant to ensure that all control actions are being fully and robustly implemented by the competent person.
- 4.2.6 The Group will ensure audits are undertaken annually, by an independent competent person, to all systems identified as high risk (e.g. Independent Living schemes) to ensure that all control actions are being fully and robustly implemented.
- 4.2.7 The Group will ensure that only suitably competent consultants, surveyors, risk assessors and engineers undertake works for the organisation in respect of water hygiene safety.

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- 4.2.8 The Group will make written schemes of control in communal areas of buildings available to inform occupants on how the risk of exposure to legionella bacteria is being managed and controlled.
- 4.2.9 The Group will have a robust process in place to gain access to properties where tenant vulnerability issues are known or identified while ensuring the organisation can gain timely access to any property to be compliant with this policy and safeguard the wellbeing of the tenant.
- 4.2.10 The Group will establish and maintain a plan of all continuous improvement activity undertaken with regards to water hygiene safety.

4.3 Compliance Risk Assessment/ Inspection Programmes

- 4.3.1 **Risk assessment** – The Group will establish and maintain a risk assessment for water hygiene safety operations. This risk assessment will set out the organisations’ key water hygiene risks together with appropriate mitigations.
- 4.3.2 **CDM** - to comply with the requirements of the Construction, Design and Management Regulations 2015 (CDM) a Construction Phase Plan will be completed for all void works, component replacement works and refurbishment projects where applicable (see Health & Safety Policy).
- 4.3.3 **Legionella Risk Assessments (LRA)** – The Group will carry out a programme of legionella risk assessments and risk assessment reviews to properties containing any water system that could present a risk of exposure to legionella. These risk assessments will be reviewed no later than the review date set by the LRA, or after any works have been completed to the installation. The review period for the risk assessment will be in accordance with the table at appendix 3.
- 4.3.4 **Communal blocks and ‘other’ properties** - all communal blocks and ‘other’ properties (e.g. offices, commercial shops etc.) will be subject an initial visit to establish whether a legionella risk assessment is required. Where a risk assessment is not required, the Group will record this as such on their records, including the date of the initial visit. Where a legionella risk assessment is required, the Group will ensure this communal block or ‘other’ property is included in the programme.

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- 4.3.5 **Domestic properties** – The Group will undertake an annual programme of sample surveys, based on design, size, age and type of water supply, in 5% of the general needs units on a rolling programme, whereby all properties will be eventually assessed over time.
- 4.3.6 **Void properties** – Properties left unoccupied will have frequent flushing or systems drained to comply with the Water Hygiene Procedure. Properties remaining unoccupied for more than 120 days shall have their hot and cold water installations drained down. Before occupation, these premises are to have their water systems disinfected and flushed.
- 4.3.7 The Group will carry out a programme of maintenance visits by competent persons to all properties that have a written scheme of control in place. These programmes will ensure that all maintenance and testing set out in the written scheme of control is fully completed at the times and intervals stated. The results of these visits will be recorded electronically. The frequency of inspection and monitoring of the hot and cold water systems will vary dependent on the property type and risk in accordance with the matrix at appendix 2.
- 4.3.8 The Group will appoint an independent competent person to complete a programme of compliance audits to 5% of written schemes of control to ensure that all control actions are being fully implemented. In addition, all schemes identified as high risk will receive an annual audit.

4.4 Compliance Follow up Work

- 4.4.1 The Group will ensure there is a process in place for the management of any follow-up works required following the completion of a legionella risk assessment or where identified by the competent person when undertaking required maintenance activities. Where high risk defects are identified within the LRA the required remedial works will be programmed on a priority basis derived from the property risk type and the overall risk rating applied to the assessment. Lower rated defects that do not impact directly on the legionella risk to the users will be targeted when larger scale refurbishment works are being carried out in the property

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4.4.2 The Group will ensure that there is a process in place to collate and record details of all remedial works and water testing completed against individual installations.

4.5 Contract Management

4.5.1 Regular contract meetings will be held with all external contractors to review and monitor key performance indicators.

4.5.2 On at least an annual basis, all qualifications and competencies will be reviewed (in line with those noted in section 3.2) for all areas of work they undertake on our behalf.

4.5.3 We will ensure that all external contractors are provided with up to date information relating to all relevant compliance areas.

4.6 Record Keeping

4.6.1 The Group will establish and maintain a core asset register of all properties that have a written scheme of control for water hygiene in place. This register will also hold data against each property asset of the legionella risk assessment carried out.

4.6.2 Inspection and re-inspection dates, along with LRA and monitoring records, will also be held electronically.

4.6.3 The Group will establish and maintain accurate records of all written schemes of control and any associated remedial works and water testing as per the organisation's Data Retention Policy.

4.6.4 The Group will maintain log books for all relevant sites as required to record the details of the results from the ongoing monitoring and inspection, where required.

4.6.5 The Group will hold and maintain accurate records on the qualifications of all consultants, surveyors, risk assessors and engineers undertaking water hygiene works for the organisation.

4.6.6 The Group will ensure processes and controls are in place to provide and maintain appropriate levels of security for all water hygiene safety-related data.

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5. REGULATORY STANDARDS, LEGISLATION, AND APPROVED CODES OF PRACTICE

- 5.1 **Regulatory Standards** - the application of this policy will ensure compliance with the regulatory framework and consumer standards (Home Standard) for social housing in England, which was introduced by the Regulator of Social Housing (RSH).
- 5.2 **Legislation** - the principle legislation applicable to this policy is the Health and Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999 (the Management Regulations) and the Control of Substances Hazardous to Health Regulations 2002 (as amended) (COSHH). The Group has a legal obligation under COSHH to prevent or control exposure to biological agents. Being harmful to human health, legionella falls within the scope of these regulations.
- 5.3 **Code of Practice** – the principle approved codes of practice applicable to this policy are:
- ACoP L8 - ‘Legionnaires’ disease: The control of legionella bacteria in water systems’ (4th edition 2013).
 - HSG274 - Legionnaires’ disease: Technical guidance Part 1: The control of legionella bacteria in evaporating cooling systems (2013).
 - HSG274 - Legionnaires’ disease: Technical guidance Part 2: The control of legionella bacteria in hot and cold water systems (2014).
 - HSG274 - Legionnaires’ disease: Technical guidance Part 3: The control of legionella bacteria in other risk systems (2013).
 - INDG458 - Legionnaires’ disease: A guide for duty holders Leaflet (HSE Books 2012).
- 5.4 **Sanctions** – The Group acknowledges and accepts its responsibilities in accordance with the regulatory standards, legislation and approved codes of practice and that failure to discharge these responsibilities properly could lead to a range of sanctions including prosecution by the Health & Safety Executive under the Health & Safety at Work Act 1974, prosecution under the Control of Substances Hazardous Regulations to Health (COSHH), prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007, and via a serious detriment judgement from the Regulator of Social Housing.
- 5.5 **Tenants and Leaseholders** – The Group will use the legal remedies available within the terms of the tenancy agreement, lease or licence should any tenant refuse access to carry out essential safety checks, maintenance and safety related repair works.

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5.6 **Additional Legislation** – This Water Hygiene Policy also operates in the context of the following legislation:

- The Workplace (Health Safety & Welfare) Regulations 1992
- Construction, Design and Management Regulations 2015
- Housing Act 2004
- Landlord and Tenant Act 1985
- Homes (fitness for Human Habitation) Act 2018
- Housing Health and Safety Rating System (HHSRS) 2006
- Data Protection Act 2018
- RIDDOR 2013

5.7 A process is in place to identify changes to regulation and legislation through the Group's compliance reporting framework. Any changes relating to this policy will be highlighted and implemented, including a review of policy and procedural documents.

5.8 This policy also links to the following Group Policies:

- Health and Safety Policy
- Data Archival, Retention and Disposal Policy
- Business Continuity Plan (Dealing with Emergencies)

6. THIRD PARTY LANDLORDS

6.1 The Group currently leases a proportion of its premises from 3rd party landlords whereby the landlord is responsible for compliance with all statutory legislation. As a responsible landlord The Group has a duty of care to tenants in these properties therefore it is essential that we ensure these properties meet appropriate safety standards.

6.2 In order to satisfy ourselves that 3rd party landlords are fulfilling their compliance obligations, the Compliance team will monitor compliance for all these properties to ensure that they meet all relevant statutory obligation. To do this we will make enquiries with 3rd party landlords as statutory inspections reach their anniversary date.

6.3 We will ask the 3rd party for copies of certificates to be received within 30 days of the anniversary date of the activity.

6.4 All certificates will be stored on the Compliance Management System (C365Cloud).

6.5 If evidence is not provided in a timely manner and the landlord is therefore unable to comply with their obligations, The Group will

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collaborate with the 3rd party landlord to establish a plan in order that that the property remains compliant. This may result in the Group undertaking the inspection on the 3rd party landlord's behalf and recharging the 3rd party landlord

- 6.6 Performance will be reported quarterly within the compliance scorecard and also reported to Board quarterly.
- 6.7 Where an assessment identifies remedial actions are required we will contact the 3rd party and ask for confirmation that these actions have been completed. Email confirmation will be retained as evidence. If confirmation is not provided, this may result in the group undertaking the remedial works on the 3rd party landlord's behalf and recharging the 3rd party landlord. If the works are not covered by the lease agreement, then the Group will undertake the repairs as part of its obligations.
- 6.8 It is accepted that documents prepared by the superior landlord may not be the same standard as stated in the Group's policy principles. However, as long as assessments or inspections have been carried out by competent persons then it is to be considered that the inspection is suitable.

7. IMPLEMENTATION

7.1 Training

- 7.1.2 The Group will ensure that all operatives working for, or on behalf of the organisation have the relevant qualifications required for their role.
- 7.1.3 Group staff will undertake periodic assessments of training needs and resulting programmes of internal and/or external training will be implemented via the Health & Safety team.

7.2 Performance Reporting

- 7.2.1 Robust key performance indicator (KPI) measures will be established and maintained to ensure the Group can report on performance relating to water hygiene / legionella safety.
- 7.2.2 KPI measures will be produced and provided at SLT level every month and Board level every quarter. As a minimum, these KPI measures will include reporting on:

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Data – the total number of:

- Properties – split by domestic properties, communal blocks and ‘other’ properties;
- Properties on the LRA programme;
- Properties not on the LRA programme;
- Properties with a valid ‘in date’ LRA; and
- Non-compliant properties where the LRA has expired and is ‘out of date’.

Narrative - an explanation of the:

- Current position;
- Corrective action required, if any;
- Anticipated impact of corrective action;
- The completion of any follow-up works; and
- Properties which are due to be inspected and tested within the next 30 days. This is the early warning system.

7.2.3 The Group will carry out independent third party quality assurance audits of completed legionella risk assessments. This will be a 5% sample of the total number of risk assessments carried out. In addition 100% of all risk assessments will be checked upon receipt by the Compliance Manager (Asbestos, Water & Radon).

7.2.4 The Group will require external contractors to provide the results of their own 5% (minimum) quality assurance audit checks, as required by UKAS, every month.

7.2.5 The Group will commission an independent audit of water hygiene at least once every two years. This audit will specifically test for compliance with the regulation, legislation and codes of practice and identify any non-compliance issues.

7.2.6 The audit will also look at and test processes to ensure that they are being adhered to and are still fit for purpose.

7.3 Non-Compliance Escalation Process

7.3.1 Any non-compliance issue identified at an operational level will be formally reported to the Director (Property Services) in the first instance, as soon as this is identified.

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7.3.2 The Director (Property Services) will agree on an appropriate course of corrective action with the Head of Compliance in order to address the non-compliance issue and report details of the same to the Deputy Executive Director (or Chief Executive in their absence) within 24 hours.

7.3.3 The Deputy Executive Director or Chief Executive will ensure the Board is made aware of any non-compliance issue so they can consider the implications and take action as appropriate including notification to the Regulator of Social Housing, as necessary.

8. CONSULTATION

8.1 Colleagues within the organisation have been consulted on this policy. Previous reviews of this policy have resulted in a series of consultation meetings with the Customer Forum, however the amendments on this review do not require an input from tenants or customers so there is no consultation required for this review.

9. REVIEW

9.1 This policy will be reviewed following the Group's standard three-yearly timeframes or as a result of any legislative or regulatory changes.

10. EQUALITY IMPACT ASSESSMENT

10.1 An EIA has been completed and is in place for this policy.

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Appendix 1 – Glossary of terms

Portable Water	Water that is safe to drink or use for food preparation
Legionnaires' disease	A potentially fatal form of pneumonia caused by the Legionella bacteria which can affect anybody, but which principally affects those who are susceptible because of age, illness, immunosuppression, smoking etc. Legionella bacteria can also cause less serious illnesses, which are not fatal or permanently debilitating but which can affect all people.
Legionella Risk Assessment (LRA)	Identifying and assessing the hazards and the risk associated with those hazards from exposure to Legionella from water sources on premises and determining any necessary precautions. The risk assessments will contain the elements of ACOP L8 (4th Edition) published 2013. The risk assessment will also identify tank fed potable water and the actions required under The Water Supply (Water Quality) Regulations 2016.
Written scheme	Comprehensive document that details the measures to be taken in order to control the risk of exposure to Legionella and how the measures are managed and implemented so that control is both achieved and effective.

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Appendix 2 – Definition of Property Types

System Type 1 – Monitored Monthly	Any property that incorporates water heaters in communal areas that store more than 15 litres of hot water irrespective of whether they are gravity fed or pressurised systems. The hot water may be supplied to residential accommodation in addition to the communal areas. This would include the larger hot water systems which pose the highest risk due to stratification and a greater difficulty in maintaining secondary distribution temperatures within recommended values. The satisfactory monitoring of these systems, as previously stated may necessitate accessing some residential areas, particularly those at the extremities of the system that represent the sentinel points. There may also be some cold water storage incorporated into these systems. Systems which include Plate Heat Exchangers would be included in this system type due to the potentially large volume of water in the circulating system.
System Type 2 – Visited Quarterly	Any property that incorporates hot water generating units only in communal areas that store 15 litres or less. Typically, this will include the following: Point of Use Water Heaters, Instantaneous Water Heaters, including Showers, Condensing Boilers & Hand Wash units although not limited to these units. The presence of the showers (mixed water and electrically heated) increases the risk of transmission and will need a robust programme of cleaning and disinfection. There may also be cold water storage associated with these systems
System Type 3 - Visited Bi Annual	Properties which have communal water storage tanks but do not have any hot water storage plant in excess of 15 litres and no communal showers. In these types of property even the small water storage can potentially increase risk (due to contamination) and regular monitoring of summer and winter storage conditions is needed
System Type 4 – Visited Annually	All other properties with no communal water storage tanks, no water heaters storing in excess of 15 litres and no communal showers such as single residential properties with a combi boiler. These are properties where due to minimal storage, water turnover is high and risks at their lowest.

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Appendix 3 – Risk Assessment Matrix

Where the LRA does not recommend a greater frequency and/or the Risk Assessment reviews do not indicate a change in circumstances then The Group will adopt a schedule of planned re-assessment based on the following;

Overall Property Risk Rating	Property Type 1	Property Type 2	Property Type 3	Property Type 4
HIGH	1 year	2 years	2 years	2 years
MEDIUM	2 years	2 years	3 years	3 years
LOW	2 years	3 years	4 years	5 years