

# WATER HYGIENE POLICY

May 2025

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# 1 Introduction

The health and safety of our tenants, leaseholders, visitors, staff and contractors is of paramount importance to Haringey Council.

We take our legal obligations and the responsibilities we have to our tenants, leaseholders, staff and contractors who live in or use our council housing to protect against water hazards very seriously.

This policy outlines the Council's commitment for achieving suitable and sufficient measures for water hygiene in our council housing, in accordance with current legislation.

This policy applies to the Council's housing stock in our role as landlord and to all employees involved with the management and maintenance of housing services including contractors or visitors to buildings for the purpose of carrying out their work duties.

When we use the terms 'we', 'our', and 'us' in this policy we mean Haringey Council.

The delivery of this policy forms an integral part of our wider council corporate commitment to create and maintain a health and safety culture amongst our staff and contractors as outlined our Corporate Health, Safety and Wellbeing Statement and Policy

## 2 Definitions

The NHS<sup>1</sup> outline that **Legionnaires' disease** is a lung infection you can get from inhaling droplets of water. It's uncommon but it can be very serious. Legionnaires' disease can be caught if breathing in tiny droplets of water containing bacteria that cause the infection.

Legionnaires' disease can be caught from the following:

- cold storage water tanks
- air conditioning systems
- taps and showers that are not used often

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<sup>1</sup> <https://www.nhs.uk/conditions/legionnaires-disease/>

## 3 Aim of the policy

This policy aims to ensure that we have relevant measures in place to comply with our legal and regulatory water safety obligations including but not limited to the Health and Safety at Work Etc. Act 1972, the Management of Health and Safety at Work Regulations 1999 and the Control of Substances Hazardous to Health Regulations 2002.

This policy sets out how we will:

- Take all reasonably practicable steps to prevent exposure to legionella bacteria from our water supply and to prevent the use of damaged and/or faulty equipment which could result in contamination of water supplies.
- Minimise the risk of water contamination mainly from our cold water storage tanks and associated pipework
- Ensure compliance with legal and statutory requirements.
- Design our water storage vessels, systems or pipework to avoid known risk factors.

## 4 Key roles and responsibilities

### 4.1 The Cabinet

Has overall responsibility for ensuring:

- The water hygiene policy is delivered to ensure full and continuing compliance with the regulatory standards, legislation and approved codes of practice.
- Suitable arrangements for water hygiene are communicated, maintained, and reviewed whenever legislative changes, lessons learnt from incidents, changes in technology, changes in guidance's or other circumstances deem it necessary.
- Sufficient numbers of competent staff are employed to meet the Council's statutory responsibilities.

### 4.2 Chief Executive

Is the statutory duty holder and has overall responsibility for ensuring that suitable arrangements and adequate resources are in place for their management team to deliver water hygiene measures.

### 4.3 Directors and Assistant Directors

Will assist the Chief Executive in the following:

- Ensuring continuous improvement through reviewing the safety performance and the safety management systems within their directorate.
- Ensuring water hygiene issues are given due priority and are adequately resourced.

- Ensuring statutory provisions are complied with and best practices are adopted in all work activities where possible.
- Reporting safety performance to our Corporate Leadership Team.
- Promoting a culture of safety risk awareness and responsibility at all levels across the organisation
- Ensuring sufficient, suitable, and appropriate skills, qualifications and training are in place through recruitment, retention and procurement policies and processes.
- Maintaining water hygiene systems and appliances that are safe to use.
- Selecting and instructing competent persons to undertake inspections and works.
- Monitoring the remedy of any defects.
- Ensuring that all documentation complies with the Regulations.
- Record keeping.

## 4.4 The Heads of Services

Have been delegated duties and responsibilities for the management of water hygiene. The responsible person is the Head of Residential Building Safety.

## 4.5 Managers, Supervisors & Competent Person(s)

Must ensure that this policy and all relevant processes and procedures are implemented as they have been planned to be. In particular, they must maintain the required level of qualification and certification for their role, (e.g., gas safe registration) and ensure that staff and contractors under their control are competent and familiar with the impact of gas safety in their day-to-day roles.

## 4.6 All employees

Are responsible for ensuring that they are familiar with and act in accordance with this policy and all agreed gas safety processes and procedures ensuring that they are implemented as they have been planned to be in their job and task descriptions.

## 4.7 Contractors

Are required to report any water hygiene concerns when instructed to work on our managed premises. They are also required to be competent and ensure that the safety of buildings is maintained during, and as a result of, all works for which they are engaged.

## 5 Our approach to managing water hygiene

### 5.1 Management of legionella

Specialist contractors who are members of the Legionella Control Association (LCA), will be appointed to carry out all legionella related inspections and works including:

- Carrying out legionella risk assessments (complete with schematics)
- Monitoring, flushing and cleaning (weekly/ monthly)
- Periodic sampling
- Remedial works and treatments
- Data collection and maintaining records
- We will identify all water plant and systems which pose a potential risk of Legionella Bacteria exposure.

### 5.2 Legionella Risk assessment

We will conduct a programme of inspection, testing and maintenance of all water systems and fixed equipment in our council housing to ensure they are safe to use. This will be delivered by a programme of water hygiene risk assessments that will examine the communal water storage tanks, calorifiers and associated pipework in our council housing.

The risk assessments will ensure that our:

- Council houses are reviewed and assessed for their level of risk and subsequent suitability for varying levels of water hygiene risk assessment.
- Water systems in our council housing will be reviewed and assessed in accordance with their assessed level of risk.
- Risk assessments will be renewed in accordance with the renewal date advised on the current risk assessment.

Approved specialist legionella contractors who are registered with the Legionella Control Association (LCA) will carry out legionella risk assessments for us strictly in accordance with the requirements of Approved Code of Practice and Guidance L 8 and BS 8580:2019, these will include:

- A site survey of the water system
- An asset register of all associated plant, pumps and other relevant items;
- Schematic diagram of the layout of the water system and associated plant
- A risk rating for the management and the systems
- A site-specific recommended monitoring, cleaning and inspection programme

Legionella risk assessments will not be carried out to single residential properties with individual cold-water storage, hot water generation and associated pipe work unless there are exceptional circumstances.

We will conduct the risk assessments at a maximum of every two years, with additional reviews in the following circumstances:

- Significant changes in legislation and guidance
- Significant alterations to any water system(s)

- Significant changes in building population or use
- Failure of the control programme or a suspected case of legionella

### 5.3 Removing and reducing risks

Wherever reasonably practical, we will remove any potential sources of contamination highlighted in a legionella risk assessment. When the risk assessments identify required measures to remove or reduce risks they will be reviewed and carried out in a timely manner as responsive repairs or as part of a planned improvement programme as appropriate.

We will eliminate or minimise exposure risks where reasonably practical by the procurement of plant, equipment and systems which have been designed to prevent or minimise the risks of exposure to legionella bacteria.

### 5.4 Data and records

We will maintain a comprehensive and digital register of all water risk assessments.

We will regularly check this to ensure it matches with our contractor records and their certification and that an agreed process for making additions and deletions to the register is being followed.

We will ensure that appropriate records are kept. All records will be securely held and legionella risk assessments and written schemes will be retained throughout the period they remain current (maximum of two years) and for a minimum two years after that period.

The results of monitoring, inspections, tests, checks, temperatures and works undertaken, will be recorded and retained for at least five years.

### 5.5 Void properties and mutual exchange

When one of our council houses becomes void (empty), we will drain and flush the water system before re-letting and replace or sterilise shower heads.

### 5.6 Access

When access to a tenant or leaseholder's home is required, we will make all reasonable attempts to contact them first, including contacting their family and other people they know who may or may not live with them in line with our access for emergencies, safety or welfare policy.

The tenancy and lease agreement set out reasons why we may need to enter properties. It also gives us a contractual right to access the property and explains when access must be provided.

Tenants must allow access to their homes for water hygiene purposes in line with their tenancy agreement and our access policy.

If tenants refuse access after reasonable requests, we:

- may ask the court for an injunction to allow us access into the property and the tenant to pay our legal fees.
- may obtain a warrant of entry from the Magistrates Court

We will only enter a tenant or leaseholder's home or other property e.g. garages without their permission or a pre-arranged appointment in exceptional circumstances where there is an emergency.

## 5.7 Communication

We will help residents stay safe in their homes through our messaging of water hygiene safety advice and make efforts to communicate water hygiene messages to tenants, leaseholders and their tenants. We will also encourage and support residents to report to us any concerns about water hygiene.

We will use the following methods of communication:

- Providing updates through our Homes Zones magazine
- At sign up new tenants are provided with a link to an online tenants handbook (hard copy on request) which includes water hygiene advice
- Information on our [safety for council tenants webpages](#)
- Speaking to residents about water hygiene during site visits, on our building safety patrols and through our dedicated building safety management team
- We will provide information in plain English with a simple, accessible and jargon-free style and ensure that translation and interpretation is provided where possible/when necessary
- Communications should water hygiene incidents occur.

## 5.8 Vulnerable Council tenants and leaseholders

When we need to carry out work affecting our water systems in the home of a vulnerable resident, we provide our officers or external contractors with clear instructions about any specific requirements for how that visit should be carried out. This is in line with our vulnerable tenants and leaseholders policy.

This might include but is not limited to:

- instructions about the time of the visit
- the length of time it is likely to take somebody to open the door, the amount of notice required
- the number of staff required for a visit
- the means of communication required
- or instructions about how to behave in the resident's home.

If there is a loss of water supply, we will provide fresh bottled water and work with tenancy management to support vulnerable residents to meet their specific requirements.

## 5.9 Training

We will deliver training on this policy including legionella awareness training and the procedures that support it, through appropriate methods, including team briefings and basic water hygiene training. All training undertaken by staff will be formally recorded.

## 6 Tenants' and leaseholders responsibilities

Tenants should regularly clean and disinfect showerheads and inform us if their water system temperatures appear to be unusually hot or cold or there are any other problems with the water systems.

Tenants should follow advice given and ensure that they do not operate or interfere with water appliances and outlets in any way which could endanger themselves or other building users.

Tenants and leaseholders should allow access to their home and communal areas so that we are able to undertake any necessary maintenance or inspection and testing of pipework, vessels, storage tanks and installations/outlets as outlined in section 5.6.

## 7 Legislation, regulations and guidance

As the landlord, we will ensure that we carry out our tenancy management policy in accordance with statutory requirements and best practice as follows:

- Landlord and Tenant Act 1985
- Freedom of Information Act 2000
- Health and Safety at Work Etc. Act 1972
- Management of Health and Safety at Work Regulations 1999
- Right To Repair Regulations
- Social Housing (Regulation) Act 2023
- The Public Health (Infectious Diseases) Regulations 1998
- The Control of Substances Hazardous to Health Regulations 2002 (COSHH)
- The Water Supply (Water Fittings) Regulations 1999
- Water Regulations Guide UK (including Water Bylaws 2000 Scotland)
- The Water Supply (Water Quality) Regulations 2018
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Construction (Design and Management) Regulations 2015
- Provision and Use of Work Equipment Regulations 1998
- The Building Regulations in England and Wales
- BS 8580-1:2019 Water Quality. Risk assessments for Legionella control
- BS 8558:2015 Guide to the design, installation, testing and maintenance of services supplying water for domestic use within buildings and their curtilages

- PD 855468:2015 Guide to the flushing and disinfection of services supplying water for domestic use within buildings and their curtilages
- BS 7592:2022 Sampling for Legionella bacteria in water systems – Code of Practice
- BS EN 806-5:2012 Specifications for installations inside buildings conveying water for human consumption – Operation and maintenance

#### Approved Code of Practice (ACoP)

- ACoP L8 Legionnaires' Disease, the control of legionella bacteria in water systems (4<sup>th</sup> edition, 2013)
- HSG274 Legionnaire's disease, technical guidance – parts 1,2 & 3

## 8 Performance and monitoring

### 8.1 Audit

We will conduct an independent audit of water hygiene management across our service delivery programmes through our internal and external audit programme and annual assurance statement.

Audit will as a minimum test for compliance with the regulation, legislation and codes of practice and delivery of this policy through associated procedures. It may also include or separately test for data accuracy in our programming and reporting systems.

The audits will identify any non-compliance issues and make suitable recommendations for improvement.

All agreed recommendations will be implemented within reasonable and where possible, recommended timescales.

### 8.2 Quality Control and Assurance

We will put in place quality assurance inspections of all management activities to ensure they are being fully and robustly implemented and completed safely.

Where issues of poor performance are identified, we may increase targeted inspections to establish the root cause and required improvement actions.

### 8.3 Performance Monitoring

We will monitor adherence to and effectiveness of this policy and procedures by our staff, contractors, tenants and leaseholders. We will ensure that such monitoring is sufficient to ensure policies and procedures are effective.

- Through regular reporting to our Building Safety and Compliance Board
- Through monthly contractor meetings.
- Following recommendations from on-site monitoring, audits and risk assessments.

- Resident engagement and analysis of tenant satisfaction data.
- Analysis of quality inspection results.

We will closely monitor the performance of our contractors, with specific focus upon:

- Compliance with statutory water hygiene risk assessment dates
- Timeliness of water system repairs, and remedial actions recommended in in water risk assessments
- Repairs completed on first visit
- Customer satisfaction & complaints.

We will report compliance and performance through key performance indicators, review and update those indicators as and when appropriate e.g., in response to changes in legislation or guidance etc.

## 9 Links to other policies and strategies

This policy links to and should be read together with the following Haringey Council policies:

- Access for Emergencies, Safety or Welfare Policy
- [Corporate Health, Safety and Wellbeing Statement and Policy](#)
- [Decant Policy](#)
- [Domestic Abuse and Violence Against Women and Girls Policy for council tenants and leaseholders, and those approaching the council as homeless](#)
- [Feedback Policy](#)
- Fire and Structural Safety Policy
- Gas & Heating Safety Policy
- [Housing Income Collection Policy](#)
- [Housing Arrears Policy](#)
- [Responsive Repairs Policy](#)
- [Safeguarding council tenants and leaseholders policy](#)
- [Vulnerable council tenants and leaseholders policy](#)

## 10 Resident co-production and engagement

**When did you discuss development of this policy with residents?**

At meetings of the Resident Voice Board in July 2024 and February 2025.

**What did they tell you?**

Clarification on the approach to removing and reducing risks from legionnaires disease when they are identified.

**How has what residents told us informed development of this policy?**

Section 5.3 of the policy confirms the approach to removing and reducing risks. This confirms that wherever reasonably practical, we will remove any potential sources of contamination highlighted in a legionella risk assessment.

## 11 Equalities

The Council has a Public Sector Equality Duty (PSED) under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act.
- Advance equality of opportunity between people who share protected characteristics and people who do not.
- Foster good relations between people who share those characteristics and people who do not.

The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex, and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

Although it is not enforced in legislation as a protected characteristic, we treat socioeconomic status as a local protected characteristic.

This policy makes no changes to operational practices. They are being updated to reflect the insourcing of the council housing function. There are no known equality issues with current provision, and it is not anticipated that there will be disproportionate impacts on any protected characteristics, disadvantaged communities or vulnerable residents.

This policy has a section (section 5.8) which details the support provided to vulnerable tenants and leaseholders across housing management and building safety. This summarises and links to the approach outlined in the Council's Vulnerable Tenants and Leaseholders Policy. A comprehensive EQIA was conducted for the Vulnerable Tenants and Leaseholders Policy as part of its approval by Cabinet in July 2024.

## 12 Reviewing the policy

We will review this policy every three years with the next review due in May 2028 unless earlier events or legislation require an earlier update to this policy.