

Water Hygiene Policy

Summary

This policy outlines Portsmouth Homes' approach to managing water systems to minimise risks from legionella and other bacteria, ensuring compliance with statutory and legislative requirements.

It applies to all Portsmouth Homes assets, including residential and communal properties, and outlines responsibilities for risk assessment, control, and communication.

Effective date

1 October 2024

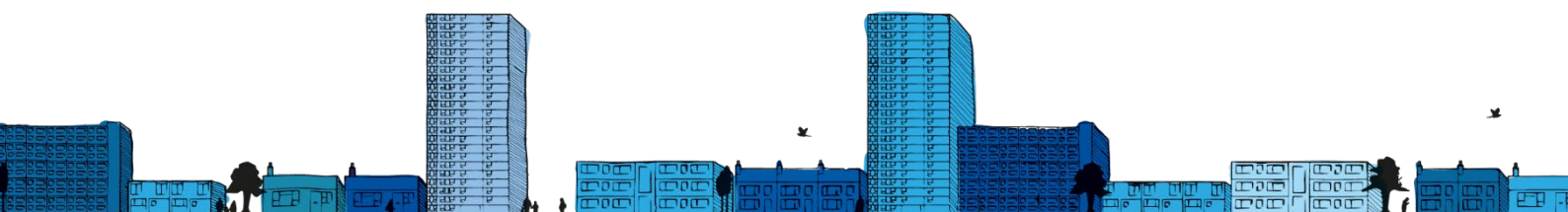
Review

Latest Review Date: 15 December 2025

We will review this Policy every 3 years or when there has been an update to legislative, regulatory, best practice or operational changes.

Version

Version 1.1



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Scope

This policy covers:

- All Portsmouth Homes, Housing Revenue Account (HRA) assets, including residential dwellings and sheltered schemes; other assets such as offices, garages community buildings and land where we have a repair and maintenance responsibility.

Any reference in this policy to 'we', 'our' or 'us' refers to Portsmouth Homes.

Any reference in this policy to 'tenant', 'customer' or 'resident' refers to a Portsmouth Homes tenant, leaseholder or shared owner.

Purpose

The purpose of the policy is to:

- Outline our approach to the management of water systems to help reduce the risk of residents being exposed to legionella and other bacteria.
- Ensuring we meet our statutory and legislative obligations.

Management of Legionella

Legionnaires' disease is a potentially fatal form of pneumonia. Everyone is susceptible to infection with some people being at a higher risk. Legionnaires' disease is contracted by inhaling small droplets of water (aerosols), suspended in the air, containing the bacteria.

The Responsible person for Portsmouth Homes is the Water Quality Engineer, who manages it on a day-to-day basis.

For the purpose of LRA's, the Responsible Person will be the Director of Housing, Neighbourhood and Building Services.

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)
- Temperature monitoring (monthly)
- TMV Servicing
- Cleaning and descaling of shower heads in communal areas
- Sampling of hot and cold water systems (six-monthly)
- Identifying remedial works and treatments
- Data collection and maintaining records

Weekly flushing is carried out and recorded by PCC / site staff where applicable



We will identify all water plant and systems which pose a potential risk of Legionella Bacteria exposure.

Legionella risk assessment (LRA)

All buildings with communal water outlets (excluding external taps) and/or those that store hot or cold water in communal areas, such as communal water storage tanks, calorifiers, and associated pipework, are required to have a current and compliant legionella risk assessment.

Legionella risk assessments are generally not conducted for single residential properties with individual cold-water storage, hot water generation, and related pipework, except under exceptional circumstances.

Approved specialist legionella contractors who are registered with the Legionella Control Association (LCA) will carry out legionella risk assessments strictly in accordance with the requirements of Approved Code of Practice [Legionnaires' disease. The control of legionella bacteria in water systems](#) (L8) and [BS 8580-1:2019](#), 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
- Required remedial actions to reduce and manage the risk.

A timely provision for a review of legionella risk assessments will be completed every two years. There are some legionella risk assessments that are currently on a three year cycle and once these have been completed they will revert to a maximum interval of 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

In exceptional circumstances. Legionella risk assessments are not required for blocks where the risk to the water system is insignificant and there is no means to monitor or sample the water system i.e. blocks of flats with bin store taps and no other communal outlets or cold-water storage tanks.

Removing and reducing risks

Wherever reasonably practical, we will remove the potential source of contamination. When legionella risk assessments identify required measures to remove or reduce risks they will be reviewed and carried out in line with the Legionella Risk Assessment timeframes as responsive repairs or as part of a planned improvement programme as appropriate.



All remedial actions identified within legionella risk assessments are reviewed and raised, completed and carried out in line with the Legionella Risk Assessment timeframes, if this is not achievable additional mitigation will be introduced.

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.

New development schemes and major refurbishment projects will be subjected to a design review at the design stage as a desk top exercise examining, design drawings, specifications, employer's requirements, component manufacturer's guidance and the like, to confirm that the water installation proposals meet with current legionella regulations, Approved Code of Practice [Legionnaires' disease. The control of legionella bacteria in water systems](#) (L8) and best practice and to draw attention to any potential future maintenance issues.

Controlling risks

Where it is not reasonably practical to remove risks, then a written scheme for controlling measures will be prepared by the specialist legionella contractor, reviewed, implemented and managed by the Water Hygiene Engineer.

The control regime will include as appropriate:

- Good design – for avoidance of water stagnation including removal of pipework that is no longer in use or become isolated from the main flow, referenced as dead legs
- Good design - avoiding use of materials in the water system that may harbour and encourage growth of bacteria or other nutrients
- Temperature control, monitoring, inspection and flushing
- Correct and safe operation of equipment and plant including maintenance requirements and frequencies
- Testing of water quality as required

To ensure control measures implemented remain effective, the condition and performance of the system will be monitored; the frequency and extent of the routine monitoring will depend upon the operating characteristics of the system.

When legionella sampling is undertaken, the samples are to be analysed at a laboratory accredited by the United Kingdom Accreditation Service (UKAS) in accordance with the Approved Code of Practice [Legionnaires' disease. The control of legionella bacteria in water systems](#) (L8). The samples are to be taken in accordance with [BS 7592:2022](#).

Audits will be implemented as a further control to ensure that this policy, operating procedures and the services provided by the specialist legionella contractors are compliant.

We will ensure inspection and monitoring activities are undertaken in line with the risk assessment.



Void Process

We consider the risks from hot and cold-water systems in most domestic properties with no shared water system to be low as they have regular water usage and turnover.

However, when a property becomes void and a water system is to be kept live during the void process, we ensure that all outlets within the property are flushed for at least two minutes per outlet every seven days.

If long-term works are required at the property, the system is to be flushed, isolated and drained down. Once work is complete, all redundant pipework is removed.

When the system is made live again it should be followed by a flush prior to handover and any hot water storage vessels within the property are checked to ensure they are operating at the correct temperature (storing water at a minimum of 60°C).

Record keeping

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 will be retained for at least five years.

Training for staff

The Head of Compliance, along with the Water Quality Engineer and other competent roles that support the management of legionella will be provided with regular training so that they are properly updated on changes in legislation and best practice in the management and control of legionella in water services.

We will ensure suitable and sufficient training, including legionella awareness training, has been completed by staff identified. We will maintain records of all legionella training of both our staff and contractors' staff.

Water Hygiene Panel

The panel will be chaired by Head of Compliance and include appropriate Heads of Service from Buildings and Housing together with appropriate representation from the Water Hygiene Engineer and other directorates as appropriate. The panel will meet quarterly.

The panel will coordinate and communicate water hygiene across all Housing, Neighbourhood and Building teams to ensure risks are managed consistently and are appropriately resourced, complying with all legislation and providing appropriate information to residents, staff and contractors.

The panel will have oversight of the process, changes to the legislation and effectiveness of the Water Hygiene policy, updating and implementing changes as appropriate.



The panel will undertake the following:

- Review legionella risk assessments and water testing performance including any remedial actions
- Review training provided to staff
- Be informed of all water safety incidents, investigate and review any learning to inform any changes required to processes, policies or communication to residents

Your responsibility

We recommend that you flush any infrequently used outlets in your home if not used over a period of seven days for at least two minutes, and that also thoroughly flush all outlets following long periods of absence for a least five minutes.

You should ensure that you regularly clean and disinfect showerheads and inform us if your hot water is not heating properly or if there are any other problems with the water systems.

Please inform us promptly of any support requirements or additional needs within your household.

Additionally, notify us of any circumstances that may affect your household, preferred methods of contact, and any reasonable adjustments we should consider.

Any concerns in relation to Water Hygiene should be reported to the Compliance team by email to compliance@portsmouthcc.gov.uk or call 023 9284 1311.

Your voice

We provide tenants a wide range of meaningful opportunities to engage, influence and scrutinise the Landlord Strategies, policies and services, to include Resident Consortium together with repairs and maintenance focus groups.

If you would like to be included in future resident engagement focus groups and would like to know how to get involved, please contact us for more information:

You can contact our team by:

- Email: housing.engagement@portsmouthcc.gov.uk
- Phone: 02392 834835
- Website: visit the [Resident engagement and community resources on our website](#)



What have we done to make sure this Policy is fair?

We completed an Integrated Impact Assessment (IIA) to consider the positive and negative impacts this Policy may have on people with protected characteristics under the [Equality Act 2010](#). This Policy should have direct and positive equality and diversity impacts.

Regulation and legislation

We recognise the variety of legislation, and we will continue to monitor relevant legal guidance. The list below reflects some of the existing legal framework and relevant publications:

- [Health and Safety at Work etc. Act 1974](#)
- [The Management of Health and Safety at Work Regulations 1999](#)
- [The Control of Substances Hazardous to Health Regulations 2002](#)
- [Legionnaires' disease. The control of legionella bacteria in water systems](#)
- [Regulatory standards for landlords](#)
- [Social Housing \(Regulation\) Act 2023](#)

Related documents

This policy should be read in conjunction with:

- [Portsmouth Homes policies, strategies and reports](#)
- Tenancy Agreement / Leasehold Agreement
- Asset Management Strategy

How to feedback

If you have any questions around the policy or would like to know more about its application, please contact the relevant service in the first instance.

You can get this policy in large print, braille, audio or in another language by contacting your Housing Office. More information is available [translation, interpreting and audio information](#).

Compliments

To help us provide the best service we can. We would like to hear customer views on the services that they use. If the customer is pleased with a member of staff or service, please let us know.



- Telephone: 02392 606383
- Email address: HNBLandlordComplaints@portsmouthcc.gov.uk

Complaints

If a customer is unhappy, they can refer to our Landlord Complaints Policy.

- Online complaint form at [Make a housing complaint](#)
- Telephone: 02392 606383
- Email address: HNBLandlordComplaints@portsmouthcc.gov.uk

Housing Ombudsman Service

If a customer is unhappy, they can contact the Housing Ombudsman Service for advice and guidance at any time.

- Online complaint form on [the Housing Ombudsman Service website](#)
- Telephone: 0300 111 3000
- For more information, visit [Housing Ombudsman's Complaint Handling Code](#)

