

# **Water Safety Policy**

#### 1. Introduction

As a landlord, Rugby Borough Council (RBC) is responsible for the maintenance of, and repairs to, our homes, communal blocks, and other properties we own and manage.

The purpose of this policy is to ensure the safe management of water systems within properties managed by RBC. It aims to safeguard the health, safety, and well-being of tenants' staff, and contractors by preventing water-related health risks, including Legionnaires' disease, scalding, and water contamination.

The policy outlines procedures for the maintenance, monitoring, and risk management of water systems to comply with current legislation and best practices.

This policy forms part of our suite of landlord compliance policies, which include:

- Lift Safety Policy
- Fire Safety Policy
- Asbestos Management Policy
- Gas Safety Policy
- Electrical Safety Policy
- Condensation, Damp and Mould Policy

### 2. Scope

- 2.1 This policy applies to Rugby Borough Council homes.
- 2.2 This includes domestic properties (houses, bungalows and flats), including RBC homes being used as temporary accommodation, communal areas of any blocks, independent living schemes and their associated offices or communal spaces.
- 2.3 The policy covers both domestic water systems (cold and hot water) and water used in communal facilities, such as heating systems, kitchens and laundries.

- 2.4 This policy also applies to any corporate or operational premises which are owned or managed via the Housing Revenue Account (HRA).
- 2.5 This policy is applicable to all of our staff, tenants, contractors, stakeholders and others who may work on, occupy, visit or use our premises, or who may be affected by our activities or services.
- 2.6 Compliance with this policy is mandatory for all RBC staff members.

#### 3. Terms and definitions

- 3.1 RBC is committed to ensuring compliance with all relevant legislation, including:
  - · Health and Safety at Work Act 1974.
  - Control of Substances Hazardous to Health (COSHH) Regulations 2002.
  - The Water Supply (Water Quality) Regulations 2016.
  - The Legionella Control in Water Systems (Approved Code of Practice L8).
  - Building Regulations 2010 (Part G Sanitation, Hot Water Safety, and Water Efficiency).
  - The Housing Health and Safety Rating System (HHSRS) under the Housing Act 2004.
  - The Drinking Water Inspectorate (DWI) guidelines.
  - Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013.

These regulations and standards ensure that the water systems are maintained in a safe, hygienic, and efficient manner, minimising the risk of contamination, scalding, and disease transmission.

#### 4. Responsibilities

- 4.1 The Asset Maintenance Manager is responsible for overseeing the implementation of this policy. Their duties include:
  - Developing and reviewing water safety procedures and risk assessments.
  - Conducting regular audits and inspections of water systems to ensure compliance with safety standards.
  - Coordinating maintenance schedules for water systems, including hot and cold-water storage, treatment, and distribution.
  - Ensuring that appropriate records are maintained for water safety checks, Legionella risk assessments, and system maintenance.
  - Facilitating training and guidance to RBC staff regarding water safety procedures.
- 4.2 RBC staff are required to:

- Follow water safety procedures and guidelines in their daily operations.
- Co-operate with water safety inspections, testing, and maintenance activities.
- Report any concerns or issues related to water systems, such as unusual water temperatures or signs of contamination, to the Asset Maintenance Team.
- Ensure that tenants are informed of their responsibilities for water safety and are encouraged to report any problems promptly.
- 4.3 All contractors working on servicing or maintaining water systems are required to:
  - Be trained and qualified to work on water systems in accordance with relevant regulations.
  - Ensure that any maintenance, repair, or installation work is carried out in compliance with the Health and Safety Executive (HSE) guidelines for Legionella control and water safety.
  - Provide necessary certifications for works carried out and report any issues identified during maintenance or inspection.
- 4.4 Tenants of RBC are expected to:
  - Report any issues related to water safety, such as unusual water temperatures, leaks, or signs of contamination.
  - Maintain safe use of water systems by following the guidance provided by RBC on how to avoid scalding risks and prevent water contamination.
  - Allow access for regular water system inspections and maintenance works as required.

#### 5. Policy Statement

- 5.1 Our appointed contractor will conduct a Legionella risk assessment for all communal areas with water systems that are at risk of Legionnaires' disease, including:
  - Residential properties with communal hot water systems (e.g., flats or apartment blocks).
  - Independent Living Schemes, where the elderly or vulnerable individuals may be more susceptible.
  - Properties with complex water systems (e.g., high-rise buildings, heating systems with water storage).

Risk assessments will be carried out every two years or when significant changes are made to the water system, such as system upgrades or changes in occupancy. The risk assessment will identify potential risks, recommend control measures, and provide a detailed action plan to manage any identified hazards.

- 5.2 To prevent contamination, scalding, and Legionella growth, RBC will in communal areas:
  - Maintain safe water temperatures: Hot water should be stored at 60°C and delivered at maximum 50°C at taps and showers to prevent Legionella growth, while ensuring water is not too hot (to avoid scalding risk)
  - Ensure cold water is stored and delivered at a temperature below 20°C to prevent bacterial growth.
  - Monitor water temperatures regularly to ensure compliance, with monthly checks carried out by contractors or staff.
  - Weekly flushing particularly in communal areas where water outlets (e.g., taps, showers) are infrequently used. This includes systems in void properties.
- 5.3 Where there is a requirement, water storage tanks, pipes, and valves will be inspected regularly to ensure they are free from corrosion, leaks, and any form of contamination.
- 5.4 Water tanks will be cleaned in line with risk assessments, and any buildup of scale will be removed. Any system that is found to have stagnant water or visible contamination will be immediately serviced and disinfected.
- 5.5 Where necessary, water treatment chemicals (e.g., biocides) will be used to control microbial growth in water systems, particularly in systems that are at higher risk.
- 5.6 To prevent scalding risks, RBC will:
  - Install Thermostatic Mixing Valves (TMVs) in relevant properties, particularly in communal bathrooms or kitchens.
  - The appointed contractor will regularly monitor water temperatures to ensure that they do not exceed safe levels, and any systems exceeding 50°C will be adjusted.
  - Inform tenants about the risks of scalding and advised them to use temperature controls properly, particularly in bathrooms and kitchens.
- 5.7 We will carry out monthly water temperature checks in communal hot water systems, with records maintained. Tenants are encouraged to report any issues with water temperature in their home.
- 5.8 We will test water samples in high-risk areas, independent living schemes or communal systems, for Legionella bacteria at least annually. In cases of suspected contamination, immediate testing and remediation will occur.

- 5.9 We will maintain comprehensive records of:
  - Risk assessments for Legionella and water systems.
  - Water temperature readings and maintenance schedules.
  - Legionella test results and actions taken to address any issues.
  - Details of any water system repairs, replacements, or improvements.
  - Tenant communications and guidance on water safety.

Records will be kept for a minimum of six years and will be available for inspection by regulatory bodies or auditors.

- 5.10 All staff involved in the management and maintenance of water systems will receive regular training on water safety, including:
  - Legionella control measures and prevention.
  - Safe operation and maintenance of hot and cold-water systems.
  - The identification and reporting of water-related risks.
- 5.11 In the event of a water safety emergency, such as a suspected Legionella outbreak or scalding incident, we will:
  - Notify the Duty Holder and Nominated Person with overall managerial responsibility and the Safety and Resilience Manager.
  - Notify Health and Safety Enforcing Authority HSE.
  - Form an internal incident control team, including nominating an individual with overall control.
  - Shutdown area suspected of generating outbreak.
  - Undertake detailed investigation in conjunction with EHO and appointed specialist.
- 5.12 We will share data with other agencies in line with the appropriate data protection legislation to enable the safety and wellbeing of our tenants.

## 6 Monitoring and review

- 6.1 This policy will be reviewed on a three yearly cycle, unless there is a business need, change in legislation or regulation which prompts an earlier review.
- 6.2 We will publish this document on our website and our intranet to ensure visibility and access for staff and tenants.
- 6.3 We will provide training to staff who have responsibility for implementing the policy to ensure that it is understood.
- 6.4 As this is a tenant facing policy, we will review the effectiveness of the policy with our involved tenants one year from the implementation of the

policy.

# 7 Related documents

- 7.1 Health and Safety Policy
- 7.2 Safeguarding Adults and Children Policy
- 7.3 RBC Policy Document for the Effective Control of Legionella within Premises August 2024

# 8 Governance

Effective from	1 July 2025	Expires	30 June 2028
Policy Owner	Asset Maintenance Manager		
Policy Author	Communities and Projects Manager		
Consultation	Tenant Consultation – 4 June 2025		
	Frontline Staff Consultation – 29 April 2025		
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Approved by	Chief Officer – Communities and Homes		
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