



WOKINGHAM
BOROUGH COUNCIL



**Approved by
Tenant Volunteers**

Wokingham Borough Council

Water Safety Policy

July 2026



This is the Policy for Legionella Safety
for Wokingham Borough Council's
Housing Service.

If you need a copy of this publication in
another format, please contact the
number below.

0118 974 6000

Accessibility and Translation

If you or somebody you know requires this document in a different format, please refer to the following table for guidance.

English	Arabic	Hindi	Punjabi	Telugu	Urdu	Chinese Mandarin	Polish
Copies of this policy may be obtained in large print, Braille, on audio cassette or in other languages. To obtain a copy in an alternative format please telephone 0118 974 6000.	تتوفر نسخ من هذه السياسة في طبعات كبيرة أو بطريقة بريل أو على شرائط صوتية أو بلغات أخرى. وللحصول على نسخة بالتنسيقات البديلة، يرجى الاتصال بنا على رقم الهاتف: 0118 974 6000	इस नीति की प्रतलिपि या बड़े प्रन्टि में, ब्रेल में, ऑडियो कैसेट के रूप में या अन्य भाषाओं में प्राप्त की जा सकती है। वैकल्पिक प्रारूप में प्रतलिपि पाने के लिए, कृपया 0118 974 6000 पर फोन करें।	ਇਸ ਨੀਤੀ ਦੀਆਂ ਕਾਪੀਆਂ ਵੱਡੇ ਅੱਖਰਾਂ ਵੱਚਿ, ਬਰੇਲ ਵੱਚਿ, ਆਡੀਓ ਕੈਸੇਟ 'ਤੇ ਜਾਂ ਹੋਰ ਭਾਸ਼ਾਵਾਂ ਵੱਚਿ ਪ੍ਰਾਪਤ ਕੀਤੀਆਂ ਜਾ ਸਕਦੀਆਂ ਹਨ। ਕਸਿ ਵਕਿਲਪਕਿ ਫਾਰਮੈਟ ਵੱਚਿ ਇੱਕ ਕਾਪੀ ਪ੍ਰਾਪਤ ਕਰਨ ਲਈ ਕਰਿਪਾ ਕਰਕੇ 0118 974 6000 'ਤੇ ਟੈਲੀਫੋਨ ਕਰੋ।	ఈ పాలసీ కౌపీలను వొడద వొరింట్లో, బ్రియిల్, బ్రియిల్, ఆడియో కేసెట్ లో, ఆడియో కేసెట్ లో లేదా ఇతర భాషలలో వొందవచ్చు. వొరత్తయి మనయి ఫర్మాట్లో వొండడనీ కి దయచేసి 0118 974 6000 కు టెలీఫోను చేయండి.	اس پالیسی کی نقلیں بڑے حروف، بریل، آڈیو کیسٹ کی صورت میں یا دیگر زبانوں میں بھی حاصل کی جا سکتی ہیں۔ متبادل فارمیٹ میں نقل حاصل کرنے کے لیے برائے مہربانی 0118 974 6000 پر ٹیلیفون کریں۔	本政策副本能以大字版、盲文版、录音带或其他语言的形式提供。如需获取其他格式副本，请致电 0118 974 6000。	Egzemplarze tej polityki są dostępne w wersji z dużą czcionką, w języku Braille'a, na kasetach magnetofonowych lub w innych językach. Aby otrzymać egzemplarz w innym formacie, należy zadzwonić pod numer 0118 974 6000.

Document Control Information

Title: Legionella Safety Policy

Date: July 2026

Version: 3

Classification: This is a working/live document and is subject to change.

Policy Writers: Neil Hutchinson, Interim Strategic Asset Manager

Version	Date	Description
1	March 2020	Policy and Procedure for Legionella Management
2	September 2021	Policy and Procedure for Legionella Management
3	July 2026	Legionella Safety Policy

Implemented:
July 2026

Review Date:
March 2029



SIGNING OFF SECTION

This Policy has been subject to consultation, proof-reading, ease of reading and sign off with the following:

- Asset Management and Compliance Team.
- Repairs and Maintenance Consultative Panel.
- Local Housing Companies (Loddon Homes Ltd and Berry Brook Homes Ltd).
- Legal Services.
- Housing Leadership Team.
- Housing Innovation Partnership.



Contents

Legionella Safety Policy	4
1. Policy Overview	4
2. Purpose	4
3. Scope	4
4. Legislation and Regulatory Requirements.....	5
5. Definitions	7
6. Roles and Responsibilities	8
7. Governance	9
8. Policy Review	10
9. Equality and Diversity	10
10 Appendices	11



Legionella Safety Policy

1. Policy Overview

- 1.1 Wokingham Borough Council (WBC) manages approximately 3,000 residential properties, which will all have active hot and cold-water systems, and a proportion of these will have shared water systems.
- 1.2 This policy provides a framework within which the risks associated to water hygiene and legionella bacteria will be managed. It will include the associated roles and responsibilities, as well as the governance arrangements to ensure WBC is meeting its legal and moral duty to ensure that council tenants, employees, contractors and visitors are adequately protected from all foreseeable legionella risks that may arise in homes owned and managed by the Council.
- 1.3 This Policy will be supported by a Legionella Safety Management Plan (LSMP), which provides operational details to managing legionella safety including monitoring arrangements, risk management, access procedures, and emergency protocols. The operational procedures in the LSMP set out how WBC will meet the statutory obligations outlined in this policy; therefore, the LSMP is enforceable through this policy.

2. Purpose

- 2.1 The purpose of this policy is to ensure that all water systems within the homes and buildings owned and managed by Wokingham Borough Council are monitored, well maintained and in a safe and compliant condition
- 2.2 This policy is designed to protect the health and safety of tenants, residents, staff, contractors and visitors by minimising the risk of exposure to legionella bacteria, scalding, and other waterborne hazards.
- 2.3 This policy outlines the statutory and regulatory obligations applicable to WBC and states the governance arrangements in place to meet these.

3. Scope

- 3.1 This policy applies to all residential properties owned and managed by Wokingham Borough Council where water systems are present and subject to water hygiene, safety, and compliance requirements.
- 3.2 It covers:
 - Council-owned tenanted dwellings,
 - Temporary accommodation provided by the Council,



- Communal water systems in residential blocks (e.g. tanks, calorifiers, pipework, and outlets),
- Gypsy, Roma and Travellers (GRT) sites,
- Properties managed by Wokingham Borough Council on behalf of a client.

3.3 The policy applies to all employees, contractors, and agents acting on behalf of the Council in the delivery of water safety management, inspection, and compliance services. It does not apply to commercial or corporate properties, which are governed by separate water safety arrangements.

4. Legislation and Regulatory Requirements

4.1 Wokingham Borough Council recognises its statutory and regulatory obligations in relation to water safety, as well as the available codes of practice, which can be found listed below:

- Health and Safety Executives (HSE) Approved Code of Practice (ACOP) L8 2013
- Health and Safety Executives (HSE) HSG274 Legionnaires' disease 2024
- Health and Safety at Work Act 1974
- Defective Premises Act 1972 (Section 4)
- Building Regulations Act 1984
- Landlord and Tenant Act 1985 (Section 11)
- Environmental Protection Act 1990
- Personal Protective Equipment at Work Regulations 1992
- Secure Tenants of Local Housing Authorities (Right to Repair) Regulations 1994
- Management of Health and Safety at Work Regulations 1999
- Water Supply (Water Fittings) Regulations 1999
- The Water Supply (Water Fittings) Regulations 1999
- Control of Substances Hazardous to Health Regulations 2002
- Housing Act 2004
- Decent Homes Standard 2006
- Housing Health and Safety Rating System (HHSRS) 2006
- Equality Act 2010
- Control of Asbestos Regulations 2012
- Reporting of Injuries Diseases & Dangerous Occurrence Regulations 2013
- Construction (Design and Management) Regulations 2015
- Pressure Equipment (Safety) Regulations 2016
- Data Protection Act 2018
- Homes (Fit for Human Habitation) Act 2018
- BS8580-1: 2019 Water quality, Risk assessments for Legionella control
- BS8680: 2020 Water quality, Water safety plans
- BS7592:2022 Sampling for Legionella bacteria in water systems



- Pre Action-Protocol for Housing Condition Claims England 2021
- Building Regulations – Sanitation, hot water safety and water efficiency: Approved Document G 2024
- Social Housing (Regulation) Act 2023; Consumer Standards framework – Safety and Quality Standard

4.2 To comply with these requirements WBC will ensure compliance with the relevant statutory requirements. This will include but is not limited to the following activity:

- Ensure that works in relation to a legionella risk assessments and water hygiene remedial activities are carried out by a suitable qualified and competent person in line with the regulations.
- Ensure that all parties contracted/commissioned by WBC to carry out works in relation to a legionella and water hygiene are working to current regulations and standards.
- Complete a programme of risk assessments, inspections, cleansing, disinfection and sampling on its water installations to identify and assess the sources of of risk, including checking whether conditions will encourage bacteria to multiply.
- The key triggers to commission a new risk assessment are:
 - Changes to the water system: Any alterations to the plant, water system, or its use (e.g., new tanks, pipes, or outlets).
 - Changes to building use: Changes in building occupancy or purpose.
 - Ineffective control measures: If monitoring, inspection, or sampling reveals that control measures (e.g., temperature) are not effective or if Legionella bacteria is detected.
 - Changes to personnel: Changes in the "responsible person" or key staff managing the system.
 - A case of Legionnaires' disease: An outbreak or case of Legionella bacteria associated with the system.
 - New knowledge: Availability of new information regarding risks or control.
- Where appropriate, prepare a written scheme for preventing and controlling the risk, and where identified, carry out the necessary works to remove or reduce risk within the required timescales.
- Keep a record of each risk assessment, written scheme of control and inspection checks for at least five years.
- All water systems will be maintained to ensure that cold water temperatures below 20°C and hot temperatures above 50°C are supplied to outlets. All stored hot water will be maintained at temperatures of 60°C or above.
- At void stage;

- drain down water systems (where applicable, e.g. not in ASHP dwellings where weekly flushing takes place),
- remove water storage tanks (where possible),
- where water storage tanks remain in situ, ensure:
 - it is clean,
 - has a tight-fitting lid, and
 - is suitably lagged.
- remove visible 'dead legs' and redundant water pipework,
- replace shower heads and hoses,
- set the temperature of the calorifier to ensure water is stored at 60C and distributed at 50C minimum at the furthest outlet,
- flush all water outlets,
- produce a water compliance document to confirm the above works/checks.

5. Definitions

5.1 For the purpose of this Policy and the LSMP, the following definitions apply:

- WBC: Wokingham Borough Council.
- Tenant: a person that has signed a tenancy agreement to rent a home from WBC.
- Licensee: a person who is granted permission to occupy a property without acquiring tenant rights.
- Resident: a person that is registered as living in a WBC home.
- Leaseholder: a person that owns a home within a WBC owned building.
- Visitor: a person that visits a WBC home / building and is not referenced amongst the above definitions.
- Employee: a person that is employed and works for WBC.
- Client: a person /company which WBC is working on behalf of e.g. Loddon Homes Ltd and Berry Brook Homes Ltd.
- Contractor / Agent: a person / company that works on behalf of WBC.
- Legionella: A type of bacteria (Legionella Pneumophila) commonly found in water systems that can cause Legionnaires' disease (Legionellosis), a potentially fatal form of pneumonia when inhaled through small droplets of water (aerosols) suspended in the air.
- Legionella Risk Assessment (LRA): is a systematic evaluation of water systems to identify and control the risks associated with Legionella bacteria.
- Water System: Any hot or cold-water installation including tanks, calorifiers, pipework, outlets, thermostatic mixing valves (TMVs), and associated control equipment.
- Calorifier: is an indirect-fired water heater or hot water storage tank that heats water using an external heat source, providing a continuous supply of hot water for domestic or commercial use.



- RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013): Requires the reporting of water-related incidents that cause death, or major injury.
- HHSRS (Housing Health and Safety Rating System): A risk-based evaluation tool to help local authorities identify and protect against potential risks and hazards to health and safety from any deficiencies identified in dwellings.

6. Roles and Responsibilities

6.1 Wokingham Borough Council (WBC) is the landlord responsible for ensuring the statutory and regulatory obligations are met.

6.2 The Chief Executive is the appointed Duty Holder and has the overall responsibility for health and safety across the organisation and will nominate appropriately qualified and suitable experienced people to discharge those duties in relation to the management of water safety and controlling the risks associated to legionella bacteria.

6.3 The Cabinet Member for Housing Services is responsible for ensuring performance on housing safety and compliance is reported to tenants and Members as appropriate.

6.4 The Service Director for Housing Services is responsible for ensuring that sufficient resources are provided for ongoing delivery of the policy and that employees have the appropriate competencies and qualifications, and for setting budgets that are sufficient to meet compliance requirements.

6.5 The Strategic Asset Manager is responsible for overseeing the implementation of this Policy. They are also responsible for procuring services within the respective budgets allocated, as well as adhering to the Housing Services assurance framework in relation to water safety and controlling the risks associated to legionella bacteria.

6.6 The Building Compliance Manager is responsible for the contract management of suppliers and contractors as well as the performance monitoring and management of these agreements to ensure compliance with legislation. They are also responsible for ensuring that relevant employees and contractors have the necessary qualifications and training to undertake their roles in respect of water safety and controlling the risks associated to legionella bacteria.

6.7 The Compliance Officer is responsible for the day-to-day operational duties to ensure water hygiene and legionella checks are carried out within the required timescales, certification and service records are checked and stored, with the respective systems and documents updated. They will also support the Building Compliance Manager with the contract management duties of the suppliers and contractors engaged to deliver water hygiene and legionella works.



6.8 Contractors will employ competent operatives who will have the knowledge, skills and experience to complete repairs, testing and installation works. They will arrange appointments with tenants and administer the required communications to arrange access. Upon completion of the relevant water hygiene and legionella checks/works, they will provide the relevant certification, documents and reports to WBC.

6.9 Tenants will allow reasonable access to their homes for the purpose of water hygiene and legionella inspections, monitoring and remedial works when requested. They will follow guidance provided by the Council on maintaining safe water use. They will also report concerns about water temperature, discolouration, or infrequently used outlets to the Council or its appointed contractor immediately.

7. Governance

7.1 Water hygiene and legionella performance reports will be produced and presented to several internal groups and forums, aligned to the Housing Services landlord assurance framework, to provide evidence of compliance and ensure suitable operational and strategic oversight.

7.2 Water hygiene and legionella performance will be submitted externally to the Regulator of Social Housing, on an annual basis, in accordance with the Technical Requirements of the Tenant Satisfaction Measures (TSM).

7.3 In addition, the following quality assurance activity is undertaken:

- The Compliance Officer will check all Legionella Risk Assessment's (LRA) for completeness and compliance and will liaise with the respective contractor regarding any concerns until a satisfactory conclusion.
- Internal audit will provide independent assurance on the operation and effectiveness of controls regarding water hygiene and legionella safety. The frequency is agreed as part of the Internal Audit Programme and reported to the respective WBC Committee.
- A third-party supplier, independent to the contractor completing the water hygiene and legionella checks/works, will complete a percentage of post-inspection checks.

7.4 Employees undertaking key roles within the delivery and management of water safety will have access to training and support applicable to their roles.

7.5 Water hygiene and legionella related accidents, incidents and near misses will be reported on WBC's health and safety system in accordance with the Council's health and safety procedures and will be investigated by a member of the Asset Management and Compliance team. Any RIDDOR reportable incidents will be reported to the Health and Safety Executive (HSE).



8. Policy Review

8.1 This Policy will be reviewed every three years, or sooner, if and whenever there are any relevant changes to legislation, regulatory requirements, case law or good practice that would impact this policy, as well as any required service improvements identified through internal audits, service reviews, learning from complaints or regulatory judgements.

8.2 The review process will:

- Assess the effectiveness of existing procedures and controls.
- Incorporate feedback from audits, inspections, and performance monitoring.
- Reflect any organisational changes or lessons learned.
- Ensure continuous improvement in water safety management.

8.3 The Strategic Asset Manager will lead on future policy reviews and any revisions will be approved through the appropriate governance channels and communicated to all relevant stakeholders.

9. Equality and Diversity

9.1 Wokingham Borough Council is committed to promoting equality, diversity, and inclusion in the delivery of all its services, including water hygiene and legionella safety. The Council recognises that some residents may have specific needs or vulnerabilities that require reasonable adjustments or additional support to ensure they can comply with water safety requirements and access services safely.

9.2 Wokingham Borough Council recognises Legionnaires' disease (Legionellosis) is a potentially fatal form of pneumonia and everyone is susceptible to infection. The risk increases with age but some people are at higher risk including:

- People over 45 years of age,
- Smokers and heavy drinkers,
- People suffering from chronic respiratory or kidney disease,
- Diabetes, lung and heart disease, or
- Anyone with an impaired immune system.

9.3 In implementing this policy, the Council will:

- Ensure communication and information relating to water safety is accessible and available in a range of formats and languages, where required.
- Make reasonable adjustments for individuals with disabilities, health conditions, or support needs, including offering alternative access arrangements or involving support services.

- Treat all residents with dignity and respect, free from discrimination based on age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation.
- Monitor the delivery of water safety services to identify and address any inequalities in outcomes or access.

9.4 This commitment supports the Council's broader responsibilities under the Equality Act 2010 and its duty to foster good relations, eliminate discrimination, and advance equality of opportunity.

10 Appendices

10.1 Appendix A - Equality Impact Assessment Form



WOKINGHAM
BOROUGH COUNCIL

End of Document
