



South Cambridgeshire District Council

Water Hygiene Policy (Housing)

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1. Introduction

- 1.1 South Cambridgeshire District Council (SCDC) has a duty of care to employees, tenants, visitors and the public that may be affected by the operation and maintenance of premises by the organisation.
- 1.2 SCDC will therefore provide sufficient resource to ensure that water storage and distribution systems are operated and maintained in accordance with current legislation and guidance and shall take all reasonably practical steps to ensure risk of Legionella proliferation and contamination is minimised.

2. Scope and purpose

- 2.1 This policy covers the management and control of Legionella and other contaminants in water systems. It aims to ensure that the highest reasonably practical standards are maintained throughout the organisation and all directives issued by the Health & Safety Executive, Department of Health and the British Standards Institution relating to prevention and control of Legionella will be adopted where relevant.
- 2.2 This policy applies to all residential and communal buildings that are owned and managed by SCDC. This does not include properties managed by Ermine Street Housing or Shire Homes Lettings, as they have their own policies.

3. Responsibilities

- 3.1 SCDC will appoint a 'Responsible person' to ensure that the commitments in this policy are carried out as well as the actions identified in the risk assessments, see Management structure below:

Duty Holder: Head of Housing

Has ultimate accountability for controlling the risk of Legionnaire's disease.

Responsible Person: Service Manager - Housing Assets

Oversees the overall implementation of this policy.

Deputy Responsible Person: Asset & Compliance Manager

Supports the responsible person in the day-to-day management of this policy.



Site Responsible Person: Sheltered Estates Officer (SEO)

Responsible for flushing 'little used' outlets and for reporting any water hygiene or other water risk issues.

- 3.2 Where contractors carry out risk assessments, works, or checks on our behalf, they will be required to meet our health and safety standards and be appropriately qualified and accredited.

4. Background

- 4.1 Legionnaires' disease can prove fatal as confirmed by a number of cases, all of which could have been prevented if adequate preventative measures and contingency plans were in place. It is these preventative measures that SCDC will address across its housing stock to protect tenants, staff, visitors, contractors and the general public.
- 4.2 Legionella is a naturally occurring organism widely dispersed in nature, there is a constant risk of the bacteria entering the building services of our properties. Therefore, the size and complexity of the properties under our control increases our risk in this area.
- 4.3 Hot and cold-water systems, including showers, need to be checked carefully when a home becomes empty to make sure everything is safe and working properly before someone new moves in.
- 4.4 SCDC's approach reflects current knowledge and best practice within the industry.
- 4.5 Legionnaires' disease can affect anybody, but some people are at higher risk (for example, men are 3 times at risk, those over 45 years of age, smokers, heavy drinkers, those suffering from chronic respiratory or kidney disease and people with an impaired immune system).
- 4.6 Legionella bacteria can multiply in domestic water systems under certain conditions. Water temperatures in the range of 20°C to 45°C favour growth. The bacteria will not survive temperatures above 60°C and remains dormant at temperatures below 20°C.
- 4.7 The bacteria also require a supply of nutrients to multiply such as:
- Algae, amoebae and other bacteria within the water itself
 - Sediment, sludge, scale and other material within the water system.



- 4.8 A reasonably foreseeable risk of exposure to Legionella bacteria exists in:
- Hot and cold-water systems.
 - Other plant and systems containing water which is likely to exceed 20°C and which may release a cloud of droplets and/or droplet nuclei (residue that remains when water has evaporated) during operation or when being maintained.
- 4.9 The disease is normally contracted by inhaling Legionella bacteria, either in tiny droplets of water in the form of aerosols or in droplet nuclei which are particles left after the water has evaporated and are contaminated with Legionella, deep into the lungs.
- 4.10 In accordance with the requirements of the Legislation and Guidance (L8 4th Edition and HSG274), the Council will:
- Identify and assess sources of risk.
 - Prevent or control the risk where possible.
 - Prepare a Legionella Management Plan (Control Scheme) for preventing or controlling the risk.
 - Implement, manage and monitor precautions put in place – ‘the Plan’ (Scheme)
 - Keep thorough records and check that what has been done is effective.
 - Appoint a competent person with sufficient authority and knowledge of the installation to help take the measures needed to comply with the law.

5. Risk assessment

- 5.1 The risk of Legionella from hot and cold water systems in most residential properties is generally considered low due to regular water usage and turnover. A proportionate risk assessment is carried out, but a detailed site-specific assessment is not normally required for domestic water supplies. Safety checks are completed before properties are re-let, and new tenants are provided with water safety guidance, such as flushing all water outlets for at least 10 minutes if the property has been unoccupied for more than seven days.
- 5.2 The exception to this is Elm Court, Over where a managed water supply is present; this is included within the site-specific risk assessment.



5.2 SCDC will carry out the relevant risk assessments to all water systems managed by the council, to determine any need for monthly, annual or less frequent monitoring. High risk areas, for example communal rooms will be inspected by a specialist contractor.

5.3 A detailed assessment shall be undertaken by a specialist contractor at all sites where a significant risk exists, which include:

- Sheltered Housing Schemes with a managed water supply
- Sheltered Housing Communal Rooms
- Communal areas/facilities
- Any establishment where volumes of water are stored and the potential for droplet formation exists.

This will include producing an action plan, where the actions will be recorded by the Council.

5.4 All risk assessments will be undertaken by persons who are competent, experienced and have been correctly trained to carry out these duties.

5.5 The risk assessment should be reviewed at regular intervals, or earlier if significant modifications are undertaken to the system design or use of the premises.

5.6 The Council will keep a record of all risk assessments undertaken, as well as information regarding the maintenance, tests and remedial works carried out together with the results for a minimum of five years.

5.7 The assessments will contain direction as to how the risk is to be eliminated, or where this is not possible, how the risk will be managed.

5.8 Where the risk assessment identifies no reasonably foreseeable risk, no further measures are necessary.

5.9 Relevant site-specific risk assessments are available on-site and for sheltered housing schemes these can be requested from the Sheltered Estate Manager.



6. Prevention and control

- 6.1 Risk control measures will be chosen to prevent the growth of Legionella bacteria in the system and to reduce exposure to water droplets and aerosols. These measures will include, where appropriate:
- Avoiding water temperatures between 20 °C and 45 °C and conditions that favour the growth of Legionella bacteria and other microorganisms.
 - Improved design of water systems with a view to eliminating 'dead legs', 'blind ends' and other places where water can stagnate.
 - Controlling the release of water spray.
 - Avoiding the use of materials which could harbour or provide nutrients for bacteria and other organisms.
 - Ensuring holding tanks are adequately covered, fitted with air vents and are lagged appropriately to prevent temperature rises.
 - Maintaining the cleanliness of the system and water in it.
 - Using water treatment techniques.
 - Ensuring the correct and safe operation and maintenance of the water system.
 - Providing staff training in personal precautions necessary when carrying out maintenance etc.
- 6.2 If the risk assessment recommends specific maintenance actions, these will be recorded, and a site-specific monitoring sheet will be provided.
- 6.3 The Council will 'design out' risks on new developments, refurbishments and when carrying out planned improvements.
- 6.4 SCDC will ensure that new tenants are made aware of the risk of Legionella, provide them with relevant information and advise them to flush through the system and ensure shower heads are clean, as part of the handover.
- 6.5 Before the commencement of a new tenancy, if the property has remained vacant for more than seven days, water systems will be flushed, either during the accompanied viewing process or prior to the tenancy beginning.
- 6.6 When risk assessments identify required works to remove or reduce risks, these will be carried out as responsive repairs or as part of a planned improvement programme.



6.7 If a risk cannot be removed, we will control the risk, in line with the Approved Code of Practice, by:

- Ensuring that the release of water spray is properly controlled.
- Avoiding water temperatures and conditions that favour the growth of Legionella and other micro-organisms.
- Ensuring water cannot stagnate anywhere in the system by keeping pipe lengths as short as possible or by removing redundant pipe work and dead legs.
- Avoiding materials that will encourage the growth of Legionella.
- Keeping the system and water in it clean.

6.8 For tenanted properties it is impractical for SCDC to carry out the regular weekly and monthly checks required to ensure safety from Legionellosis. We will publicise to residents the importance of carrying out such checks through our Water Hygiene leaflet and other resident communications.

7. Monitoring

- 7.1 SCDC will monitor the percentage of properties with a risk assessment and that regular tests, required according to policy and procedure, are carried out.
- 7.2 To ensure full compliance, regular audit of the management processes will take place by SCDC or by an External Auditor from an accredited body.
- 7.3 Regular reports and updates will be made available to relevant councillor or tenant groups.

8. Reporting concerns relating to Water Hygiene

- 8.1 If a tenant identifies any issues that may affect water hygiene in their home, such as discoloured water coming from the tap, low hot water temperature, or a leaking water tank, they must report it as a repair. Reports can be made through the designated channels:

Repairs: [Online](#) via the Council's website
By phone via the Repairs Hotline: 0800 0085 1313



- 8.2 Prompt reporting will help SCDC maintain safe and hygienic water systems for all residents.

9. Incidents where Legionella or other contaminants in water systems have been identified

- 9.1 In the event of any incidents where Legionella bacteria or other contaminants in water systems has been identified, the Council must inform the Corporate Health and Safety Team as soon as possible. They will then notify the relevant regulatory authority, where necessary reported to the HSE via the online RIDDOR process.

10. Documentation

- 10.1 The site-specific risk assessment and records of routine maintenance (logbooks) for the premises will be held in a readily accessible place, on site and electronic records held and maintained by the Asset Compliance team.
- 10.2 In addition, the Responsible Person/Contract Administrator will ensure that records and documents are maintained such as:
- All relevant water systems (with drawings as appropriate)
 - All site-specific risk assessments
 - All action plans
 - Control systems
 - Monitoring documents

11. Value for money

- 11.1 Legionella surveys will be procured, where possible, through relevant procurement framework, ensuring value for money. All other works will be procured in relation to the SCDC's financial regulations and competitive quotes sought. All goods and services procured will be at the best possible price and quality.



12. Definitions and references

12.1 Definitions

Legionella *A naturally occurring bacteria within water sources. Inhalation or ingestion of them can cause illness.*

12.2 Legislation

- [Health and Safety at Work Act 1974](#)
- Approved Code of Practice L8 (ACoP L8) Legionnaire's' Disease: The control of Legionella bacteria in water systems
- [Control of Substances Hazardous to Health Regulations 2002 \(COSHH\)](#)
- [Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 \(RIDDOR\)](#)
- [The Management of Health and Safety at Work Regulations 1999](#)
- [Landlord and Tenant Act 1985](#)
- Housing Acts [1985](#) and [1988](#)

12.3 Guidance

- HSG 274 parts 1, 2, 3
- BS 6700:2006 Guide to the design, installation, testing and maintenance of services supplying water for domestic use within buildings and their curtilages
- BS 8580:2010 Water Quality: Risk assessment for Legionella control Water Regulations Advisory Scheme (WRAS)

12.4 Legal Framework

Directly applicable to the SCDC management of water services are a number of statutory enabling acts (England and Wales), and subordinate regulations, the most important of which are shown below:

- [Water Industry Act 1991](#)
- [Water Supply \(Water Quality\) Regulations 2000](#)
- [Water Supply \(Fittings\) Regulations 1999](#)
- [Building Act 1984](#) and Sub-ordinate Regulations



- [Health & Safety at Work Act 1974](#) as enabling act to the [Workplace \(Health, Welfare and Safety\) Regulations 1992](#).
- [Corporate Manslaughter and Corporate Homicide Act 2007](#).

In addition to statutory legislation the following informative professional and approved codes of practice apply:

- British Standard BS6700:2006 for The Design, installation, commissioning, testing and maintenance of services supplying water for Domestic use within Buildings and their curtilages.
- Health and Safety Commission's Approved Code of Practice (ACOP) and Guidance L8 on 'The Control of Legionella Bacteria in Water Systems' third edition 2000 (reprint 2007). This document is used by Health and Safety Executive inspectors as the benchmark standard which, in the event of an untoward incident, SCDC must be able to demonstrate it complied with or exceeded.
- Chartered Institution of Building Services Engineers Technical Guides, notably TM13 2000.
- Health and Safety Executive's Guidance Note HSG220 'Health and safety in CARE HOMES'.
- Water Regulations Advisory Service (WRAS) 'Water fittings and materials directory'.

13. Training

13.1 Compulsory Legionella awareness training will be provided to all those who collectively contribute to ensure compliance for managing the control of Legionella within our properties:

- Responsible Persons will receive technical training to enable them to fulfil this role (at least every 3 years).
- All employees directly involved in the Legionella Control Programme will receive adequate and appropriate training.



14. Accessibility and inclusion

- 14.1 SCDC is committed to engaging with tenants and residents in line with the [Equality Act 2010](#). Reasonable adjustments will be made to ensure services are accessible to all. This may include:
- Contact preferences
 - Offering home visits
 - Use of advocates or interpreters
 - Alternative communication formats, such as large print or translated materials
 - Adjusting appointment times
 - Adjusting locations to accommodate mobility or health needs

15. About this policy

- 15.1 This policy will be reviewed every 5 years. However, earlier reassessment may be required following tenant feedback, further guidance or where there are changes in operations and/or legislation etc.
- 15.2 This policy has been produced in consultation with tenant representatives. If you are interested in getting involved in shaping our housing service, we would love to hear from you; please visit our [website](#) for more information and to get in touch.



16. Service Requests and Complaints Process

- 16.1 Tenants should report initial service requests, such as repairs or safety concerns, through the designated channels:

Repairs: [Online](#) via the Council's website
By phone via the Repairs Hotline: 0800 0085 1313

General Queries: Tel: 01954 713 000
E-mail duty.housing@scambs.gov.uk



The [Communications Charter for tenants and leaseholders](#) sets out detailed guidance on how to contact the Council and the service standards that can be expected in relation to communication and responsiveness.

- 16.2 SCDC aims to provide excellent customer service, but we recognise that mistakes can happen. If you are dissatisfied with the service you have received following a service request, you can make a complaint in accordance with the Council's Complaints Policy. To make a complaint, please visit our [website](#) or telephone 01954 713000 or email housing.complaints@scambs.gov.uk.

17. Our values

Ambitious

We are proactive and take a forward-thinking approach to addressing challenges. We create smart solutions and reach our goals with determination and a clear vision.

Collaborative

We foster a culture of teamwork and open communication. We work with and involve stakeholders, to improve how the organisation works and serves the public.

Compassionate

We prioritise empathy and understanding in decision-making and service delivery. We consider the wellbeing of people and communities in everything we do and we replicate this when we talk to our colleagues because we know that when we support each other, we all do better.

Accountable

We take responsibility for our actions and decisions. We own up to mistakes and make sure we fulfil our commitments.