



Water Safety Policy

1.0 Purpose and Scope

The purpose of this policy is to ensure that all properties within the control and responsibility of Notting Hill Genesis (NHG) have effective systems for the prevention and control of legionella and other bacterial risks present in water systems.

The policy lays out our approach to water safety and how we will meet our responsibilities and duties as a landlord and employer for safely maintaining our stock.

The policy covers all our employees and contractors undertaking works to the stock, customers and anyone likely to be put at risk from work in these properties.

The policy applies to all properties that we own or manage, including residential properties, offices, commercial properties, care and supported schemes, houses of multiple occupation and outbuildings.

2.0 Definitions

Duty Holder – the person responsible for the water systems in properties where we have control.

Legionnaires' disease – a potentially fatal form of pneumonia caused by the legionella bacteria which can be found in water and contracted through airborne inhalation.

Risk assessment – an assessment to identify and assess the hazards, and the risk associated with those hazards, from exposure to legionella from water sources on premises and determining any necessary precautions. The risk assessments will contain the elements of Approved Codes of Practice (ACoP) L8 (4th Edition) 2013.

Written scheme – comprehensive document that details the measures to be taken to control the risk of exposure to legionella and how the measures are managed and implemented so that control is both achieved and effective.

3.0 Responsibilities for water safety

NHG, as the Duty Holder and a corporate body is responsible for overall water safety in properties.

As the Duty Holder we will appoint a Responsible Person as defined in the Approved Code of Practice and Guidance L8, who may further delegate responsibilities to the Nominated Person.

The Director of Compliance is the designated Responsible Person and has the management responsibility for preventing or controlling any identified risk from legionella bacteria and oversees the creation of a written scheme and ensures it is implemented

The Head of Heat, Energy & Water, as the deputy to the Responsible Person, will manage and co-ordinate the water safety control programme for all properties within our control and responsibility.

4.0 Policy principles

NHG will deliver legal compliance.

We will ensure that portable water and private supplies within our control are maintained and clean. Where there is a requirement we will ensure they are registered with the relevant authority.

The Homes Compliance Team will carry out a programme of suitable and sufficient risk assessments to identify and assess the risk of exposure to legionella bacteria on all water systems within our control and any precautionary measures needed. For most homes, this will be a desk-based assessment unless our homes receive water from communal water tanks, when a site-based risk assessment will be undertaken.

Risk assessments will be carried out in accordance with ACoP L8 requirements, with review frequencies determined by the risk assessment findings. As guidance, this will typically be at least every four years for standard residential properties, and at least every two years for designated housing for older people, supported schemes, houses of multiple occupation and care homes, unless the risk assessment specifies more frequent reviews are required.

We will also review or carry out a new legionella risk assessment if:

- there is reason to suspect the legionella risk assessment is no longer valid (typically where there is a change in system, legionella outbreak or the water risk assessment highlights risk).
- there have been significant changes to the premises, activities, equipment, etc. covered by the assessment that could affect the legionella risk; or
- there has been a confirmed/suspected case of Legionnaires' disease or other issues that may affect water safety.

We will ensure that those engaged to carry out risk assessments and provide advice on prevention and control of exposure are approved and competent to do so. As a minimum we will verify contractor training and membership of relevant body e.g. Legionella Control Association as part of an annual contract review.

Where the risk assessment shows that there is a high risk of exposure to legionella bacteria and we cannot avoid use of these systems, we will either remove the hazard or where this is not practical implement a written scheme setting out the actions for controlling the risk of exposure.

When installing new or replacing old equipment we will only use Water Regulations Advisory Scheme (WRAS) approved plumbing materials.

We will ensure that only competent contractors undertake work in our properties. As previously mentioned we will as a minimum verify contractor training and membership of relevant body e.g. Legionella Control Association as part of an annual contract review.

We will manage the findings from risk assessments, related actions, and any subsequent monitoring as appropriate within set timescales.

Employees will receive suitable and sufficient information, instructions and training regarding legionella and our risk control strategy as required for their role.

5.0 Third Party Requirements

For properties directly managed by NHG, we will ensure that only competent and appropriately accredited contractors are appointed in accordance with relevant legislation and standards. Performance will be monitored through established contract management arrangements, review of certification and compliance data, and audit where appropriate.

For properties managed by an external managing agent or third party where NHG does not hold direct landlord compliance responsibility, NHG will seek assurance that statutory inspections, testing and remedial works have been undertaken and that valid certification is in place. NHG will review documentation provided and escalate concerns where evidence of compliance is not satisfactory.

6.0 Monitoring and review

We will monitor this policy to ensure it delivers the expected outcomes using service standards, key performance indicators, audits and health and safety inspections.

Key performance indicators are produced monthly to ensure that Legionella Risk Assessments remain in date.

This policy will be reviewed every three years in an agreed policy review programme unless there are significant changes to legislation or regulation or deficiencies or where there are changes to best practice identified. If this occurs an immediate review will be initiated.

7.0 Our approach

In writing this policy we have considered the need for assessments to ensure that we are considering equality, diversity and inclusion and privacy impact assessment but these are not relevant to this policy.

8.0 Reference

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Control of Substances Hazardous to Health 2002
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- Legionnaires' disease: the control legionella bacteria in water systems ACOP (L8), 4th Edition 2013
- Legionnaires' disease, Technical guidance, HSG274, Part 2, the control legionella in hot and cold-water systems (2024)
- Control of Substances Hazardous to Health 2002
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- BS 8580-1:2019 for Legionella Risk Assessments

- Housing Act 2004
- Housing, Health and Safety Ratings System (HHSRS)The Water Supply (Water Quality) Regulations 2016

Document control

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Version Control

Date	Amendment	Version
Apr 2019	New policy created.	1.0
Aug 2022	Reviewed policy in line with timescales.	2.0
Sep 2025	Scheduled review of policy with updates.	3.0
Feb 2026	Inclusion of arrangements for third party requirements.	3.1