London Borough of Brent

Water Safety Policy 2026-2027

This policy sets out Brent Council's approach to managing water safety risks across its housing stock and premises. It establishes the responsibilities, controls and assurance arrangements required to protect residents, staff, contractors and others from water-related health and safety risks, including Legionella and scalding.		
Owner:	**Spencer Randolph, Director of Housing Services**	
Approved by:	**DMT/Board/Cabinet**	**Insert date in format dd/mm/yyyy**
Review cycle: (years)	**1**	
Next review date:	**dd/mm/yyyy**	

Brent

Regulator:	• Health and Safety Executive (HSE) • Regulator of Social Housing (RSH) – Safety and Quality Standard • Building Safety Regulator (BSR)
Legislation:	• Health and Safety at Work etc. Act 1974 • Management of Health and Safety at Work Regulations 1999 • Control of Substances Hazardous to Health Regulations 2002 (COSHH) • Water Industry Act 1991 • Water Supply (Water Fittings) Regulations 1999 • Building Regulations 2010, where applicable • Housing Act 2004 and the Housing Health and Safety Rating System (HHSRS) • Building Safety Act 2022, where applicable to the Council's buildings and safety management arrangements • Health Protection (Notification) Regulations 2010
Codes of Practice:	• HSE Approved Code of Practice L8, Legionnaires' disease: The control of legionella bacteria in water systems • HSE HSG274 Part 2, The control of legionella bacteria in hot and cold-water systems • BS 8580-1, Water quality – Risk assessments for Legionella control • Relevant HSE guidance on the control of scalding and safe water temperatures
The policy also operates in the context of:	• Water Safety Management Plan • Building Safety Management System • Resident Engagement Strategy • Gas Safety Policy • Electrical Safety Policy • Lifts and Lifting Equipment Policy • Asbestos Policy • Health & Safety Policy • Complaints Policy • Repairs and Maintenance Policy • No Access Policy

DRAFT

Contents

1. Purpose 4
2. Scope 4
3. Policy Statement....4
3.1 Equality, Diversity and Inclusion 5
4. Strategic Principles....6
4.1 Lifecycle Water Safety Management 6
4.2 Risk-Based and Proportionate Control 6
4.3 Governance and Accountability 6
4.4 Competence and Training 6
4.5 Resident Engagement and Inclusion....7
4.6 Monitoring, Audit and Continuous Improvement....7
4.7 Open Safety Culture....7
5. Governance and Accountability 7
5.1 Duty Holder 8
5.2 Water Safety Management and Assurance 8
5.3 Employees....9
5.4 Residents and Leaseholders 9
5.5 Contractors....9
6. Monitoring and Assurance 9
7. Communication....10

DRAFT

1. Purpose

The purpose of this policy is to set out Brent Council's commitment to managing water safety risks across its housing portfolio, and to demonstrate compliance with all relevant Water Safety legislation and standards. Our objective is to protect life, property, and the wider community through a robust safety culture embedded at every level of the organisation.

Water safety within Brent Council is managed through a structured, risk-assessment-led process. All relevant water systems are subject to a competent Legionella Risk Assessment (LRA), which establishes the baseline level of risk and the required control measures. Each LRA is supported by a documented desktop review at defined intervals to confirm that the assessment remains suitable and sufficient, proportionate to risk, and reflective of current system conditions.

2. Scope

This policy applies to:

- All residential properties owned or managed by Brent Council that contain water systems. Including general needs housing, supported and sheltered schemes, temporary accommodation, and houses in multiple occupation (HMOs).
- Communal water systems in mixed-tenure blocks where Brent Council retains responsibility for safety in common areas.
- All Brent Council staff, contractors, and partners involved in housing management, maintenance, or compliance services that could affect Building Safety.

Non-Housing corporate premises are covered under the Council's Corporate Health and Safety Policy.

3. Policy Statement

Brent Council recognises its duties under health and safety legislation to control the risks from waterborne hazards (such as Legionella bacteria) and hot water scalding in its housing properties. We are committed to safeguarding residents, staff, contractors, and the public from water that may be unsafe due to harmful bacteria, parasites, extreme temperatures, or other water quality issues.

Brent Council operates a two-stage assurance process for water safety risk management. This comprises the baseline Legionella Risk Assessment, followed by a formal desktop review of the existing assessment every two years. Desktop

DRAFT

reviews ensure that assessments remain valid between physical surveys and confirm whether a full re- assessment is required. Control measures are derived from, and remain aligned to, the findings of the most current valid risk assessment.

Our policy is to:

- **Comply Fully** with all relevant water safety legislation, regulations, and Approved Codes of Practice and to proactively adapt to new or emerging guidance on water hygiene and safety.
- **Prevent Waterborne Risks** by implementing robust risk assessments and control measures for Legionella and other water hazards in the design, construction, operation, and maintenance of our water systems.
- **Maintain Safe Water Systems Throughout the Lifecycle** of each building, ensuring that water safety is considered at every stage from design and installation through to occupation, ongoing maintenance, refurbishment, and decommissioning.
- **Ensure Competence and Accountability** by appointing appropriately qualified persons to oversee water safety, providing training to staff and contractors, and holding individuals accountable for their water safety responsibilities.
- **Engage Residents and Stakeholders** by communicating clearly about water safety measures in their homes and ensuring that vulnerable residents (who may be at greater risk of scalding or infection) receive appropriate consideration and protection.
- **Promote Continuous Improvement** by learning from incidents, audits, near-misses, and resident feedback to update our water safety practices and ensure they remain effective and up to date.

This policy reflects Brent Council's commitment to a proactive, risk-based, and transparent approach to Building Safety management across all its housing assets, in order to protect the health and wellbeing of residents and others.

3.1 Equality, Diversity and Inclusion

This policy embodies Brent Council's commitment to Equality, Diversity and Inclusion within our work and the services we provide. Please refer to our Equality, Diversity and Inclusion Strategy here: brent-equity-diversity-and-inclusion-strategy-2024-28-digital-version-v2.pdf

Brent Council will ensure that Water Safety measures consider the diverse needs of residents and staff, including those with disabilities, language barriers or additional vulnerabilities, in line with the Equality Act 2010.

DRAFT

4. Strategic Principles

Brent Council's approach to implementing this policy is guided by the following principles:

4.1 Lifecycle Water Safety Management

- Water safety will be embedded throughout each building's lifecycle, including during design and construction, during occupation (through effective maintenance and control measures), and through refurbishment to decommissioning.
- We will maintain accurate and up-to-date water system information to inform decision-making and ensure continuity of safety measures over the life of the building.
- All water safety data, schematics, and risk assessments form part of the Golden Thread under the Building Safety Act 2022.

4.2 Risk-Based and Proportionate Control

Brent Council applies a proportionate, risk-based approach to water safety management, in line with ACOP L8 and BS 8580-1.

- Proportionality is achieved by undertaking a full physical Legionella Risk Assessment where required, and by completing structured desktop reviews of existing assessments at defined intervals where system configuration, usage, and risk profile remain unchanged.
- Desktop reviews allow the Council to confirm the ongoing suitability and sufficiency of an existing assessment without unnecessary intrusion, while ensuring that full re-assessment is triggered promptly where changes, incidents, or control failures indicate increased risk.
- Resources and controls will be targeted according to factors like the design of the system, building occupancy (e.g. housing for elderly or vulnerable residents), and history of water quality issues.
- Control measures include temperature regimes, flushing, disinfection, sampling, and maintenance of thermostatic mixing valves (TMVs).

4.3 Governance and Accountability

- Clear lines of responsibility and robust governance arrangements will underpin water safety management. Brent Council will designate specific duty holders and responsible persons for water safety at strategic and operational levels.
- Water safety performance and compliance will be monitored through established governance structures, ensuring senior oversight and accountability for delivering this policy.

4.4 Competence and Training

- All staff and contractors involved in Water Safety will be suitably trained and

DRAFT

qualified. Competence will be maintained through ongoing professional development and independent verification where appropriate.
- All risk assessors and technicians will hold current City & Guilds, BOHS, or Water Management Society accredited training.

4.5 Resident Engagement and Inclusion

- Residents and leaseholders will receive a Water Safety leaflet at sign-up and following inspections, including information on safe use of showers and flushing outlets.
- Brent Council will provide residents with relevant information or instructions to help control water risks: for instance, guidance on cleaning shower heads, flushing infrequently used outlets after periods of non-use, or reporting any concerns.
- We will seek to engage residents through communications and, where appropriate, consultation on major works affecting water systems.
- Particular consideration will be given to residents who may be at higher risk from water hazards (for example, people who are at higher risk of scalding due to age or disability) to ensure suitable additional measures or adjustments are in place.

4.6 Monitoring, Audit and Continuous Improvement

- Water safety performance will be reviewed and verified through regular inspections, internal and external audits, and data analysis.
- Brent Council is committed to learning from any Building Safety incidents, audit findings, or near-misses, as well as updates in legislation or best practice, in order to continually improve our water safety management systems and procedures.
- Monitoring and audit arrangements include verification that Legionella Risk Assessments have been completed, recorded, and subject to timely desktop review, with outcomes documented and acted upon where re-assessment is required.

4.7 Open Safety Culture

- Brent Council will promote a just and open culture where employees, contractors, and residents can report safety concerns without fear of reprisal. All reports will be investigated, acted upon, and used to strengthen system-wide learning.

5. Governance and Accountability

Brent Council operates a clear governance framework that defines strategic accountability and operational responsibility for water safety across all housing assets. The structure ensures effective oversight, competent delivery, and

DRAFT

continuous improvement.

5.1 Duty Holder

The Chief Executive is the Council's Duty Holder for health and safety and retains ultimate accountability for water safety compliance. They ensure that appropriate arrangements, competent personnel, and sufficient financial and organisational resources are in place to manage risks associated with waterborne hazards such as Legionella.

This accountability is supported through the Council's governance framework, including the Brent Housing Committee Board, internal audit, and reports to the Cabinet and Audit & Assurance Committee.

5.2 Water Safety Management and Assurance

Strategic Responsible Person	Name	Spencer Randolph
	Position	Director Housing Services
	Email	spencer.randolph@brent.gov.uk
	Responsibilities	Holds overall strategic accountability for compliance with water safety legislation and standards. Approves the Water Safety Policy and Management Plan, secures resources, and ensures that water safety is integrated within the wider Building Safety and Asset Management Strategy. Champions a positive safety culture and ensures that performance and risks are reported to the Chief Executive and corporate governance boards.
Deputy Strategic Responsible Person	Name	Gary Mitchell
	Position	Head of Service Housing Management Property
	Email	gary.mitchell@brent.gov.uk
	Responsibilities	Supports and deputises for the Strategic Responsible Person. Coordinates the delivery of the water safety strategy across departments, ensuring collaboration between housing, asset management, and compliance teams. Monitors performance data, escalates significant risks, and ensures that water safety is given appropriate priority within service planning.
Local	Position	Strategic Compliance Manager

DRAFT

Responsible Person	Responsibilities	Provides assurance that operational arrangements for water safety are effective and compliant. Oversees the implementation of the Water Safety Management Plan, monitors contractor performance, and ensures that records, risk assessments, and statutory inspections are accurate and up to date. Acts as the principal contact for regulators, the Health and Safety Executive, and public health authorities.
Compliance Lead (Contract Manager)	Name	John Roche
	Position	Contract and Compliance Manager Mechanical
	Email	John.Roche1@brent.gov.uk
	Responsibilities	Acts as the Council's professional lead for Gas Safety compliance. Manages the delivery of testing, inspection, and remedial programmes, verifies contractor competence, and monitors KPIs and SLAs. Provides expert advice to the Local Responsible Person on technical standards, legislation, and best practice.

5.3 Employees

All employees must cooperate with the Council's water safety arrangements, follow safe systems of work, complete relevant training, and report hazards or defects promptly.

5.4 Residents and Leaseholders

Residents and leaseholders must cooperate with water safety requirements, allow access for inspections and sampling, and follow any guidance to prevent stagnation or scalding risks.

5.5 Contractors

All contractors must be competent in accordance with ACoP L8 and HSG 274, comply with Brent Council's procedures, and carry out works safely. Failure to do so may result in contract termination or removal from approved supplier lists.

6. Monitoring and Assurance

Compliance with this Policy will be monitored and verified through both ongoing performance tracking and periodic reviews. These reports enable senior management to review safety performance and address any areas of concern.

- Water safety performance reporting includes assurance on the completion

DRAFT

and timeliness of Legionella Risk Assessments and their associated desktop reviews, including confirmation of whether assessments remain valid or whether full re-assessment has been triggered.

- Key performance indicators (KPIs) will be reported monthly to the Brent Housing Committee Board.
- Audits will be conducted to provide assurance that the Council's Policies and Management Plans remain effective and compliant with current legislation and best practice.
- The Water Safety Management Plan outlines in detail how compliance will be achieved and evidenced, including the use of our chosen compliance monitoring system (True Compliance). We will utilise such systems to maintain accurate records and produce management reports.
- A formal review of this policy will take place every 12 months, or sooner if legislation or best practice changes.

7. Communication

This policy will be published on Brent Council's website and made available to all relevant stakeholders, including residents, staff, and contractors. Brent Council will communicate with residents about safety in their buildings through appropriate channels.

Residents who remain dissatisfied with any water safety issue response may escalate via the Brent Council Complaints Policy.

DRAFT

DRAFT