
Water Hygiene Briefing Report

Lead Member Briefing

Decision to be taken by: Cllr Elly Cutkelvin

Date of meeting: 11th. August 2025

Housing Scrutiny Commission

Date of Meeting: 26th. August 2025

Lead director: Chris Burgin

Useful information

- Ward(s) affected: Potentially all
- Report author: Simon Nicholls
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- Report version number: v.1

1. Summary

This report has been prepared to update members of the Housing Scrutiny Commission on how the Housing Division manage water hygiene safety in its communal areas and tenants' homes.

We have a duty under the Social Housing Regulation Act to report on communal area water hygiene safety to ensure that actions are compliant. We do not have to report on water hygiene in our domestic properties, but we do take a range of measures to ensure our tenants homes are safe.

This report will give an overview of our approach to managing water hygiene in both our communal areas and domestic properties.

2. Recommended actions/decision

That the contents of this report are noted.

3. Scrutiny / stakeholder engagement

4. Background and options with supporting evidence

The Housing Division manages water hygiene in both our communal areas and in our domestic properties.

The responsibility for water hygiene management sits in Technical Services in the Compliance Team where there is a dedicated water hygiene compliance officer who is tasked with ensuring ongoing compliance. Other teams have responsibilities, such as Tenancy Management who carry out weekly temperature checks in Sheltered Schemes and Voids/Repairs who ensure that the works required as a result of a Legionella Risk Assessment (LRA) are completed prior to the start of a new tenancy.

Communal Areas.

We have a total of 1535 communal areas, only 36 of these have a water supply that requires us a landlord to carry out a LRA. All our communal LRA are complete and are reviewed as part of an ongoing cyclical programme. The frequency of a review is dependent on the block risk. High risk blocks and sheltered accommodation units are completed annually whereas lower risks block that may just have a cleaner's sink will be risk assessed every three years.

We have made changes to the way we record LRA on NEC, each communal area that requires a LRA is highlighted, the date of the last inspection is entered and this populates the date when the next one is due. This will form part of a compliance dashboard that will include gas, electrical, asbestos, fire and lift safety.

We are confident that we meet the Housing Regulators requirements for water safety in communal areas and we have the ability to report on compliance.

Water Hygiene in our tenants' homes.

It is not mandatory that we carry out LRA on individual homes.

81% of our stock does not have any stored water and are therefore classed as very low risk. Hot water is provided by a gas fired combination boiler and the cold water is fed directly from the mains. General water hygiene advice is given to all new tenants and there is information available on the website.

In addition, we have committed to carrying out LRA to 10% of our stock every year, this is currently happening on all void properties and will soon be in place on properties having capital works carried out. The LRA is currently carried out by a contractor, it may recommend works are completed, which we will complete, a copy of the LRA is then provided to the tenant. The LRA that have been completed so far have confirmed that the properties are low risk with very few remedial works being required.

15% of our homes do have stored water and are therefore higher risk (more detail below), these are mainly homes linked to the district heating network or our sheltered accommodation units. Currently the risks are managed by maintaining water temperatures to levels that don't allow legionella to develop with regulator temperature testing and flushing of systems, however our medium-term strategy is to design out the need for stored water and the associated risks by carrying out capital improvements.

The following are examples of the capital schemes we are currently undertaking to design out stored water.

Sheltered Accommodation.

Currently the heat and hot water is supplied via a communal boiler and hot water is stored in an Elson tank in the flat. To design out the need for stored water we have carried out a pilot project at Fredrick Jackson House that replaces the stored water with an multi point instantaneous hot water heater, the cold-water supply to the bath and toilet was fed from a tank and the supply to the kitchen and bathroom sinks were mains fed, this has been altered so that 100% of the cold water supply is now mains fed. The central heating continues to be delivered via the communal boiler. The advantages to this are that we now have no cold-water storage or water tanks that require ongoing inspections/cleaning, hot water is still instantaneous, and tenants only pay for what they use via their electricity bills. We have removed the hot water charge from their fixed services charges as their hot water will be heated by electricity, investigations have concluded that as a result of not paying this fixed charge and only paying for the hot water they use they could be up to £300 better off each year as a result.

We are monitoring the pilot property so we are sure that the alterations deliver the expected outcomes and will then look to roll this out across all 14 schemes.

District Heating.

Properties connected to the DH network have a cold-water storage tank and either a tank or cylinder for hot water.

We have recently carried out a pilot project to remove the tanks, feed the cold water from the mains and fit a Heat Interface Unit to provide the heat and hot water. This is like how the heat and hot water is delivered in the tower blocks. This still gives the residents hot water on demand but also gives them greater control over the heating as the HIU acts like a conventional combination boiler but rather than the water being heated by gas heat is transferred from the district heating pipework, we have fitted new controls and a programmer similar to those in a standard house so tenants can set the temperature and programme when it comes on and goes off.

Initially we want to roll this out to all properties on St Marks; to help part fund this we have submitted a bid to Government to part fund a programme of installations for all 432 properties. We expect to hear if our bid has been successful soon.

Further breakdown of property types

We are confident that 96% of our residential stock is low risk from a water hygiene perspective, 81% of our stock does not have any stored water, hot water and heating is delivered via a combination boiler and cold water is mains fed and each of these properties is visited annually as part of the annual gas inspection.

Properties connected to the district heating network are low risk as the temperature is maintained at levels that prevent legionella forming, and tests are carried out on the system in relation to water hygiene.

The remaining are made up from:

Two newly acquired flatted dwellings called the ZIP and Citygate buildings we have LRA and PPM's in place.

Blocks of flats on Harwin Road, Ethel Road, Glenhills Boulevard and New Parks that have cold water storage tanks that feed the whb/bath and w/c, cold water to the sink is mains fed, and heating and hot water are supplied by a combination boiler.

Managing the risk these tanks have now been removed at Harwin Road, and the Compliance Team are currently in the process agreeing the programme of works to remove the tanks in the remaining blocks and anticipate that they will all be removed by the end of the current financial year 25/26.

There are a small number of residential properties that still have a back boiler fitted due to the tenant's refusal to have their heating upgraded to include the installation of a combination boiler. Currently the water to their whb/bath and w/c is supplied from a water storage tank in the loft. All tenants that have this arrangement are currently being visited so that arrangements can be made to upgrade the systems and remove the tank.

Properties called Evesham House, Upper Tichbourne Street, have a commercial boiler and cylinder, and we have robust PPMs in place.

St Leonards Court and Welford Road – both properties are fully electric and have cylinders and immersion heaters. We are currently considering replacing these cylinders with instantaneous water heaters. All cold water is mains fed, there is no cold stored water, so the level of risk is low.

5. Financial, legal, equalities, climate emergency and other implications

5.1 Financial implications

This report is summarising our current strategy of managing water hygiene in homes, sheltered accommodation and the district heating network.

15% of council owned homes are intended to have their current set up reviewed with any updates being funded by the capital programme. When this is confirmed in the future, a review will need to be undertaken to ensure capital budget is available to complete the necessary works.

The pilot scheme for sheltered accommodation appears to offer a saving, but this amount needs to be determined.

For houses on the district heating network, updates are intended across the network, starting at St Mark's which will be subject to a successful HNES bid. Once the outcome of the bid is received, it needs to be ensured that the programme is fully funded by the grant received as no allocation has been made in the capital programme for this.

It is requested that the report returns to finance prior to HSC.

Signed: Jade Draper, Principal Accountant

Dated: 05/08/2025

5.2 Legal implications

S126 of The Social Housing (Regulation) Act 2023 places a general health and safety function on registered providers of social housing. Under S126B, providers are required to *“(a) monitor the provider’s compliance with health and safety requirements; (b) assess risks of failure to comply with health and safety requirements; (c) notify the responsible body of the provider of (i) risks assessed under paragraph (b) of material failures by the provider to comply with health and safety requirements; (ii) material failures by the provider to comply with health and safety requirements; (d) provide advice to the responsible body as to how the provider should address risks and failures notified to the responsible body under paragraph (c) for the purpose of ensuring that the provider complies with health and safety requirements.”*

The provider (under s126C) then has a duty to ensure the appropriate health and safety lead has sufficient resources to perform the health and safety obligations.

Signed: Zoe Iliffe, Principal Lawyer (Property Highways & Planning)

Dated: 12/08/25

5.3 Equalities implications

Under the Equality Act 2010, public authorities have a continuing Public Sector Equality Duty (PSED) which means that, in making decisions and carrying out their activities they have a statutory duty to pay due regard to the need to eliminate unlawful discrimination, harassment and victimisation, to advance equality of opportunity between people who share a protected characteristic and those who don't and to foster good relations between people who share a protected characteristic and those who don't.

Protected Characteristics under the Equality Act 2010 are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

This report has been prepared to update members of the Housing Scrutiny Commission on how the Housing Division manage water hygiene safety in its communal areas and tenants' homes. There are no direct equality implications arising from it.

People will be from across many protected characteristics, Water safety measures should be accessible to all residents, including those with disabilities. This includes providing clear and concise information in accessible formats and ensuring that physical access to water sources is not restricted.

Signed: Equalities Officer, Surinder Singh, Ext 37 4148

Dated: 1 August 2025

5.4 Climate Emergency implications

There are limited climate emergency implications directly associated with this report. More widely however, this work may have a positive impact on carbon emissions where gas water heating is replaced with electric water heating and tenants have more control over heating their homes.

Signed: Phil Ball, Sustainability Officer, Ext 37 2246

Dated: 4 August 2025

5.5 Other implications (You will need to have considered other implications in preparing this report. Please indicate which ones apply?)

6. Background information and other papers:

7. Summary of appendices:

APPENDIX A-

APPENDIX B –

APPENDIX C-



FRI frequency.xlsx

APPENDIX D –



Sample FRI Report
01012025 to 310120;

8. Is this a private report (If so, please indicate the reasons and state why it is not in the public interest to be dealt with publicly)?

9. Is this a “key decision”? If so, why?