

To: Council
Date: 23 March 2026
Report of: Director of Housing
Title of Report: HRA Property Services Policies

| Summary and recommendations | |
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| Decision being taken: | To approve the following policies: electrical safety, and legionella policies to ensure the maintenance of the housing stock. |
| Key decision: | Yes |
| Cabinet Member: | Councillor Linda Smith – Housing and Communities |
| Corporate Priority: | Good, affordable homes |
| Policy Framework: | HRA Asset Management Strategy |

| Recommendation(s): That Council resolves to: |
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| <ol style="list-style-type: none"> 1. Approve the Electrical Safety Policy 2. Approve the Legionella Policy |

| Appendix No. | Appendix Title | Exempt from Publication |
|---------------------|--------------------------|--------------------------------|
| Appendix 1 | Electrical Safety Policy | No |
| Appendix 2 | Legionella Policy | No |

Introduction and background:

1. Further to the Council approving the damp and mould, fire safety, asbestos and disrepair policies, further policies are being presented to the Council to ensure the safety of residents.
2. Making sure residents have a safe, affordable and decent place to call home is the core purpose of this work. Successive Governments has been working to strengthen the voice of residents and introduce legislation to ensure the quality of homes.
3. In 2018, the then Government published the Social Housing White Paper to ensure residents of social housing are safe, listened to, live in good quality homes and have access to help when things go wrong. Consequently, the Social Housing Regulation Act (“the Act”) received Royal Assent in July 2023. The Act forms a new regulatory framework for the social housing sector, aiming to give residents greater powers and improve access to quick and fair solutions to problems.
4. The Act aims to ensure Registered Social Landlords (RSLs) are compliant with the consumer standards by giving the Regulator of Social Housing new powers to address RSLs who are not meeting their commitments to residents.
5. The Social Housing Charter detailed what social housing residents should expect from their landlords, including feeling safe in their homes, knowing how their landlords are performing and having their complaints solved quickly.
6. The Act sets out to deliver against each of these commitments:
 - Residents to be safe in their home.
 - Residents to know how their landlord is performing.
 - Residents to have their complaints dealt with promptly.
 - Residents to be treated with respect.
 - Residents to have their voice heard by their landlord.
 - Residents to have a good quality home and neighbourhood to live in.
7. The need to ensure high standards are maintained, such as guaranteeing electrical safety standards are met and there is constant action to prevent an outbreak of legionella, can be attained by clear technical policies which ensures consistent follow through with operational work in addressing health and safety objectives.
8. The Council recognises its compliance responsibilities as well as the critical need to listen and act on the lived in experiences of our residents. There has been a series of meetings with the Residents Policy Review Group which has amended and approved the policies which are being presented to Cabinet for approval with this report.
9. The Residents Policy Review Group were critical in considering, amending and approving the policies presented in this report. This has ensured the lived

experience and advice from residents has ensured the policies are fit for purpose to meet the needs of all residents.

10. There is a need for a suite of other policies to be considered and approved by the Cabinet to meet these regulatory standards. It is envisaged that further policies, once they are considered by residents, will be presented to the Cabinet and the Council for approval.

Electrical Safety

11. It is critical that the focus on the safety of residents remain paramount. To that end, this policy addresses the key electrical standards which must be met at all times. It is also a key component of Oxford City Council's Asset Management Strategy that the useful life of individual electrical components is maximised and, hence, value for money is optimised.
12. This policy ensures that there is an electrical inspection and testing cyclical programme consisting of 5 yearly inspections for properties and communal areas. The policy also sets out that there will be a full electrical inspection before re-letting a property.
13. The risk assessment is based on the standard Electrical Condition Inspection Report (EICR) classification – C1, C2, C3, Further information (FI) – as below:

| Code | Description | Meaning | Response Time |
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| C1 | Danger present | The safety of those using the installation is at risk, and immediate remedial action is required. | Immediate |
| C2 | Potentially dangerous This term refers to a risk over a reasonable period of time where a qualified electrician has judged that a response by up to 30 days will ensure the safety of residents | While C2 issues are not immediate safety hazards, they represent a significant potential risk that should be addressed promptly to prevent accidents or damage. | Reactive Repair Within 30 days To be triaged on a case by case basis depending on the circumstances of each issue in order for some cases to be dealt with earlier, if needed, within the 30 day period |
| C3 | Improvement recommended | The installation meets safety standards; however, a C3 classification (improvement recommended) is made for the [specific area/device] to enhance the | Enrolled in a Certification Programme |

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| | | overall safety and performance of the installation." | |
| F1 | Further Investigation | Further investigation is required to determine the issue and the corrective action that was not fully resolved after the initial Certification. | Reactive Repair Within 30 days |

14. The Council is asked to approve the Electrical Safety Policy.

Legionella

15. Legionella is a bacteria which is common in natural water systems (such as streams, lakes etc) and can therefore be present in hot and cold water systems (such as, for example, storage tanks, pipework, taps and showers).
16. Legionnaires' disease is a type of pneumonia. It was named after an outbreak of severe pneumonia that affected a meeting of the American Legion in 1976. It is an uncommon but serious bacterial disease.
17. Legionnaires' disease results in pneumonia-like symptoms, which in some instances may prove fatal. Symptoms can include high fever, chills, gastric problems, headache and severe muscular ache. This is followed by a dry cough and difficulty with breathing.
18. Infection usually affects middle-aged or elderly people, and it more commonly affects smokers, alcoholics or people with other chest and respiratory problems. Those most at risk include elderly and infirm people, people who suffer from alcohol abuse, and those suffering from cancer, diabetes, chronic respiratory or kidney disease and patients using immunosuppressant medication.
19. Infection is caused by breathing tiny airborne droplets of water contaminated by the bacteria and not by drinking contaminated water. Any water application that causes the release of contaminated aerosols into the surrounding area can transmit Legionella bacteria. The bacteria have been proved to be transmitted by wet air conditioning plant, cooling towers, evaporative condensers, showers, taps, humidifiers which create a spray of water droplets such as decorative fountains, whirlpool baths, hydrotherapy baths.
20. For high risk sites, where there are vulnerable tenants, the policy details the actions the Council would take to protect residents as outlined below:

| Procedure | Frequency | Progress |
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| Flushing of little used outlets (as identified by the Risk Assessment) | Weekly | Flush through and purge to drain without the release of aerosols all little used outlets – including taps, showers and toilets. Outlets should run for 5 minutes, with care being taken |

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| | | regarding drainage capability. |
| Cold Water Systems Temperature Checks | Monthly | Check and record temperatures at the cold water sentinel taps. The temperature should be less than 20°C within two minutes. If the required temperature of 20°C is not recorded, relevant officers should be consulted (however, it should be noted that during the warmer summer months, water temperatures in excess of 20°C can occasionally be recorded. |
| Hot Water System Temperature Checks | Monthly | <p>Taps Check and record temperatures at the hot water sentinel taps. The hot water supply should reach 50°C within one minute. If the required temperature of 50°C is not recorded, the Asset and Health and Safety Officers should be consulted. Where a Thermostatic Mixing Valve (TMV) is fitted the hot water supply prior to the TMV should reach 50°C within one minute. A temperature check should be made using a surface temperature probe placed on the hot water pipe entering the TMV.</p> <p>Calorifier (Recirculating Systems Only) Check and record temperature of the water leaving and returning to the calorifier. (Where suitable gauges are not installed the check is made by placing a thermometer with a</p> |

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| | | surface probe on to the pipes). Outgoing should be at least 60°C, return not less than 50°C. |
| Shower Head / Spray Tap Cleaning | Quarterly (minimum) or more frequently if necessary | Dismantle and disinfect all showerheads using suitable materials. Use a de-scale agent (as required) to remove lime scale by soaking the showerhead for 30 minutes, or until the lime scale has been removed. All disinfection, de-scaling and cleaning products must be used in accordance with the COSHH risk assessment for the products. |
| Hot Water Systems Temperature Checks for Scalding prevention | Six monthly | Carry out inspection and test of all TMV's in line with NHS Model Engineering Specification D08 and or manufacturer's instructions. |
| Cold water storage tanks | Six monthly | Test temperatures at the incoming water inlet (or closest point) and at a point remote from the ball valve. Tests to be taken once in the winter and once in the summer, temperature should be below 20°C. |
| Calorifier inspection | Annually | Drain the calorifiers. Check for debris at base of unit. Clean and disinfect as required |
| Cold water storage tanks | Annually | Visual inspection of the cold water storage tanks to ensure that the tanks |

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| | | are in a sound clean condition and conform to all current legislation. If necessary any faults should be rectified and the tanks should be disinfected with certificates issues upon completion. |
| Cold Water Systems Temperature Checks | Annually | Test water temperature at a representative number of outlets to ensure that the system is reaching satisfactory temperatures throughout. Temperatures to be >50 °C after 1 minute All outlets should be covered over the annual period |
| Hot Water Systems Temperature Checks for Scalding prevention | Annually | Carry out service to all TMV's in line with NHS Model Engineering Specification D08 and or manufacturer's instructions. |

21. The Council is asked to approve the Legionella Policy.

Financial implications

22. These policies will be implemented within the existing budgets. There are no direct financial implications associated with their implementation, which aligns with best practice and regulatory requirements with property standards for electrical safety and legionella.

Legal issues

23. The policies being presented for approval are required under the Consumer Standard as set by legislation and the Regulator for Social Housing.

Level of risk

24. The failure of the Council to have these policies would go against the Corporate Plan to keep residents safe and could lead to regulatory infringements further to the requirements of the Regulator for Social Housing, the Health and Safety Executive and the Building Services Regulator.

Equalities impact

25. Equality Impact Assessments (EqIA) has been carried out to determine whether the policies being presented to the Cabinet for approval would have an impact

on any member of staff, tenants, or contractor workforce, which unfairly discriminates or disadvantages them in the context of the Equality Act 2010.

26. Whilst the EqIA has identified that there are no particular groups who will be unlawfully disadvantaged by these policies, it is identified that there are certain groups at increased risk from safety infringements. These groups are:
- children
 - adults with learning difficulties
 - oxygen users
 - people taking certain medication
 - those suffering the effects of drugs and alcohol
 - adults aged 65 and older
 - people with disabilities
 - Individuals being supported by the Community Safety team and related support services
27. These policies aim to reduce the risks to these groups of people through proactively identifying these risk factors, raising awareness and education.

Carbon and Environmental Considerations

28. Adoption of these policies will contribute towards the good maintenance of properties.

Conclusion

29. By approving the electrical safety and legionella policies, this will help establish the framework to maintain the housing stock and further ensure the safety of our residents. This approval would also help meet the expectations of the Regulator of Social Housing that the Council is meeting its regulatory obligations. Further HRA policies will be presented to the Cabinet and the Council for its consideration after residents have been able to assess and, if necessary, amend draft proposals.

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Background Papers:

List the background documents and, if possible, link to them.

All background papers must be listed in accordance with the Local Government (Access to Information) Act and The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012. This includes, any material which discloses facts or matters on which the report or an important part of it is based and which have been relied on in the preparation of the report

Each document must be listed and a copy of each document made available to members and the public on request, (or they should be directed where to find it if it is already published on the Council's website). All confidential, exempt, copyrighted and published works are EXCLUDED from this requirement.

- 1 Consumer Standard – Regulator of Social Housing - [Regulatory standards for landlords - GOV.UK](#)
- 2 Social Housing (Regulation) Act 2023 - [Landmark Social Housing Act receives Royal Assent to become law - GOV.UK](#)

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