



LEGIONELLA POLICY

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1. Introduction

Legionnaires' disease is a potentially fatal form of pneumonia caused by the inhalation of small droplets of contaminated water containing Legionella. All man-made hot and cold water systems are likely to provide an environment where legionella can grow. Where conditions are favourable, (i.e. suitable growth temperature range, water droplets (aerosols) produced and dispersed, water stored and/or recirculated, some 'food' for the bacteria such as rust, sludge, scale, biofilm, etc.) then the bacteria may multiply, thus increasing the risk of exposure. The infection in humans is caused by breathing in contaminated air-borne water droplets, such as water sprays from shower heads which contain the bacteria.

2. Policy Objectives

- 2.1 This policy sets out how Calvay Housing Association will comply with its duties in respect of the effective management of water systems to ensure the health and safety of tenants, staff and the general public, by minimising the risk posed by legionella.
- 2.2 The policy covers both domestic and commercial properties and aims to set out a clear approach to assessing, controlling and monitoring the risk of legionella within water systems which are under the control of the Association.

3. Legal, Statutory and Regulatory Requirements

- 3.1 There is no legislation specific to Legionella, but the following do place specific duties on landlords with regards to the control of Legionella:
 - (i) The Health and Safety at Work Act 1974 places a duty to ensure the health and safety of tenants by keeping properties safe and free from health hazards, including legionella.
 - (ii) The Control of Substances Hazardous to Health Regulations 2002 (COSHH) places a duty on landlords to:
 - Identify and assess sources of risk
 - If appropriate, prepare a written scheme for preventing or controlling the risk
 - Implement, manage and monitor precautions
 - Keep records of precautions
 - Appoint a competent person with sufficient authority and knowledge of the installation to help take the measures needed to comply with the law.
 - (iii) HSE Approved Code of Practice (ACOP) L8 is the UK's primary legionella control document and offers practical advice and specific guidance on the control of legionella bacteria in water systems and the requirements of those with responsibilities for the control of premises, including landlords.

4. Duty Holders

- 4.1 The Director will have an overall duty to ensure the organisation has sufficient resources and systems in place to achieve, maintain and deliver statutory compliance.
- 4.2 The Property Services Manager will have responsibility for delivery of the legionella management plan, reviewing policy & procedures and for associated budgets.
- 4.3 The Property Services Officer (Maintenance) will be responsible for day to day delivery, maintaining the compliance register and ensuring compliance with the ACOP.
- 4.4 The Gas servicing contractor will be responsible for servicing and remedial works to heating systems (all systems) & thermostatic mixing valves (domestic only)
- 4.5 The Association will appoint a competent external company with qualified Legionella Risk Assessors, to act as a nominated competent person.

5. Risk Assessments

- 5.1 In accordance with Regulations and good practice, the Association has a duty to assess the risk from exposure to legionella to ensure the health and safety of tenants. However, as the Association has 825 domestic properties in ownership it would not be practical to carry out full risk assessments for every property and therefore a proportionate approach will be taken as set out below.
- 5.2 Low risk properties – e.g. general needs domestic premises, including houses, flats and maisonettes where the water systems are small-scale domestic type with high turnover, i.e. in daily use, with cold water gravity-fed tank to a conventional copper storage cylinder, or mains water system with a combination boiler.
- 5.3 Medium risk - e.g. shared premises, such as the Calvay Centre and the common room of Burnmouth Court, with a cold water system fed via stored water and/or hot water via calorifiers with pumped distribution or mains water system, or domestic premises with some form of shared water storage. Fire sprinkler systems (where present) will also be classed as medium risk, as will any air conditioning system (Association's offices) or any little used outlets, e.g. taps, toilets, showers (Association's offices).
- 5.4 The initial assessment will be based on written or drawn information about properties along with site visits to a representative proportion of properties.
- 5.5 The Association will also appoint a stock condition surveyor to undertake a rolling programme of property inspections. After the initial risk assessments are complete the surveyor will continue to gather information on water systems during these visits. Where the information gathered during a visit differs from that used to carry out the initial risk assessment for the property, the risk assessment will be reviewed.
- 5.6 Void Properties - The Association also recognises that void properties have the potential to exhibit increased risk of Legionella due to the possibility of stagnant water remaining undisturbed within pipework for prolonged periods.

6. Controlling the Risks

6.1 Low risk properties - the on-going control measures will include:-

- Avoidance of debris entering water systems – systems with stored cold water to be checked to ensure tanks have tight fitting lids
- Control parameters for the system to be checked, for instance temperature settings for hot water tanks
- Redundant pipework identified and removed
- Advice provided to new tenants on maintaining safe water systems
- Advice provided to existing tenants via the Association's website and periodically in the tenant newsletter

6.2 For low risk properties, the in-house risk assessment will be reviewed every two years or if there is a significant change to the property, e.g. installation of a new heating system.

6.3 Medium and high risk properties - a specialist water quality consultant will be appointed to carry out detailed, site specific risk assessments and prepare site specific written schemes of control, which will include:-

- Details of the water systems including up to date plans or schematics
- Who is responsible for managing the property and carrying out maintenance work
- Details of the safe and correct operation of the relevant systems
- Details of control methods and precautionary measures to be taken, and by whom
- Details of the frequency and type of checks required and who will undertake these

6.4 Where water is used or stored for consumption in any devices, e.g. water coolers, tea urns, drinks machines, etc. an effective system of regular cleaning and disinfecting shall be introduced, in accordance with manufacturer's instructions.

6.5 Where air conditioning systems are present, these will be monitored and checked in accordance with manufacturer's instructions.

6.6 For medium and high risk properties, risk assessments will be reviewed annually or where there is a significant change to the property.

6.7 Void Properties - as part of our Minimum Lettable Standard and to mitigate any increased potential risk associated with void properties, the following will be carried out and recorded in the process of carrying out void repair works:-

- Thoroughly flush all taps
- Clean and disinfect, or replace (where necessary), all shower heads, and
- Inspect and report on water storage tank, where present
- Check lids on cold water storage tanks are securely fitted and replace if necessary
- Where dead legs are identified in the plumbing system, they will be removed
- Systems may be drained down if properties are to remain vacant for long periods
- System controls will be checked pre-letting, to ensure they meet safe limits

6.8 Thermostatic Mixer Valves (TMV's)

There is a range of TMV's throughout the Association's properties. Where identified, TMVs in vulnerable groups such as supported accommodation will be maintained as part of the control measures for that specific site. General housing units which have TMV's present will be inspected and maintained when properties become void or are reported to be working incorrectly.

6.9 Little Used Outlets

Where there is a water outlet, tap, sink, toilet or shower that is not used on a weekly basis (e.g. the Association's offices), a weekly flushing exercise will be carried out in house by the Property Services Officer (Maintenance), in addition to the quarterly cleaning and disinfection of showerheads and hoses carried out by our external competent contractor, and the regime recorded either manually or electronically.

7. Monitoring and Recording

7.1 The Property Services Officer (Maintenance) will ensure that all routine measures detailed in the written schemes are implemented in accordance with the required time intervals and that accurate, complete and up to date records are kept.

7.2 The Property Services Manager will carry out periodic audits of the legionella processes to ensure measures are being carried out timeously and up to date records are kept.

8. Contractors

8.1 The Association will appoint a competent external contractor to carry out Legionella preventative monitoring and water hygiene services. As a minimum requirement, contractors are required to be a registered member of the Legionella Control Association (LCA) or the Water Management Society (WMSoc).

8.2 The Association will ensure that any appointed specialist water quality consultants or contractors are competent to carry out their duties, which may include:-

- Provision of detailed risk assessments and written schemes for the prevention and control of water borne infections including Legionella
- Plumbing and engineering works on air-conditioning and hot / cold water systems
- Cleaning of water systems and chemical treatment of water supplies
- Bacterial and chemical water testing and analysis

8.3 Contracted works may include temperature monitoring, water sampling, (for all bacteria) cleaning and disinfection of showerheads and hoses, (Calvay Centre, Burnmouth Court and void properties), as well as tank inspections and other associated services, as identified within this Policy.

9. Notification Requirements

- 9.1 If it is suspected or confirmed that a tenant, employee or visitor has contracted Legionnaires' disease, Calvay Housing Association will report the incident to the HSE under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).

10. Legionella Awareness for Tenants

- 10.1 For risk levels to remain low in properties it is essential that tenants are aware of the need to have a regular turnover of water from outlets such as taps and shower heads. A Legionella awareness leaflet will be provided to new tenants in their tenancy pack and will also be made available to existing tenants through the Association's website.
- 10.2 Tenants will be advised to clean shower heads, descale and disinfect them at least every two months. For showers that are only occasionally used, tenants will be advised to flush the shower through by running the water for at least two minutes once a week.
- 10.3 Where a property is left vacant for any time (e.g. when on holiday, in hospital, etc.) tenants will be advised to flush both hot and cold water systems by running all outlets for at least two minutes.
- 10.4 Tenants will also be advised to inform Calvay Housing Association immediately if there are problems, debris or discolouration in the water.

11. Training

- 11.1 All staff involved in legionella management will be provided with adequate training to allow them to undertake their duties effectively.

12. Data Protection and Access to Personal Information

- 12.1 The Association will ensure that we meet the requirements of the General Data Protection Regulation 2018. All information provided by customers in relation to this policy will be treated with the strictest of confidence and will not be disclosed to any third party without the express permission of the person concerned.
- 12.2 Under the Data Protection and Access to Information legislation, customers have the right to request access to information pertaining to them which is held by the Association. Requests for such access will be processed in line with the Association's relevant policy and procedures.

13. Policy Review

- 13.1 This policy will be reviewed every three years or sooner, if required by statutory or regulatory requirements.