Legionella Policy (4)

AS WITH ALL OF THE ASSOCIATION'S POLICIES and PROCEDURES, THIS GUIDE, IN FULL AND IN PART, CAN BE MADE AVAILABLE IN SUMMARY, ON TAPE, IN BRAILLE, AND IN TRANSLATION INTO MOST OTHER LANGUAGES –

PLEASE ASK A MEMBER OF STAFF IF YOU WOULD LIKE A VERSION IN A DIFFERENT FORMAT

Approved By	Committee of Management at the meeting on 6TH February 2008
Last review	June 2017
Next Review	May 2022

1.0 Policy Objectives and Accountability.

1.1 The overall aim of this document is to set out how the Association will meet its statutory duties in relation to the management of legionella bacteria and associated organisms in water systems.

1.2 The Association aims to protect the occupiers of its properties, as well as other residents, visitors, staff, contractors and the general public, from the risks associated with legionella so far as reasonably practicable.

1.3 The document sets out key policy objectives, control measures and accountabilities for ensuring safety from infection from legionella.

1.4 The Chief Executive retains overall accountability for the implementation of this policy and is the Responsible Person.

1.5 The Projects Manager is responsible for the implementation and delivery of the policy and ensuring that adequate resources are available to enable the objectives of the policy to be met.

1.6 The Senior Projects Officer supported by the Projects Officer is responsible for the operational delivery of the Legionella Management Plan (LMP), including the management of contractors/consultants carrying out routine testing, inspections, maintaining records and modifying deficient systems where identified.

2.0 Information on Legionella

2.1 Legionella is a potentially fatal form of pneumonia, which can affect anybody, however it is known to principally affect persons who are termed ‘susceptible’ due to factors such as age, illness, immuno-suppression, smoking etc. Infection by legionella bacteria can prove fatal, and has been identified as a cause of death in a number of outbreaks, however if adequate control measures and preventative actions are taken the risks can be significantly reduced.

2.2 Legionella bacteria occur naturally and can be found in low levels in the natural water sources from where our water supplies are obtained i.e. reservoirs, rivers and lakes. The bacteria survive in a wide variety of environmental conditions, however research has identified that water temperatures between 20°C and 45°C are conducive to growth of the bacteria.

2.3 It is important to note that legionella outbreaks are generally associated with large premises where water storage is of large capacity and, in addition, the

water is normally subject to some form of process, i.e. condensing towers, misting equipment, central air-conditioning systems, large air scrubbers etc.

2.4 In the context of the Association's operations it is important to note that there have been no known recorded cases of legionella outbreaks associated with domestic water systems.

3.0 Legislation

3.1 The purpose of this policy is to ensure that the Association is compliant and meets its obligations under the following guidance and legislation:

- The Health and Safety at Work etc. Act 1974,
- The Control of Substances Hazardous to Health Regulations 2002,
- The Management of Health and Safety at Work Regulations 1999,
- Approved Code of Practice (ACOP) L8 – Legionnaires Disease: The Control of Legionella Bacteria in Water Systems. Approved Code of practice and
- HSG274 Part 2 - The control of legionella bacteria in hot and cold water systems and Part 3 – The control of legionella bacteria in other risk systems.
- BS8580:2010 – Water Quality – Risk Assessments for legionella Control – Code of Practice

3.2 The Association recognises the need to protect its employees and others from the potential affects of legionella bacteria by:

(i) complying with the above health and safety legislation,
(ii) implementing standards not less than those described in the ACOP,
(iii) appointing a person or persons, to take managerial responsibility for implementing and monitoring any legionella control systems,
(iv) the provision of information, instruction and training for employees and
(v) where appropriate, ensuring that health surveillance is carried out.

4.0 Risk Control

4.1 The Approved Code of Practice & Guidance document L8 requires employers, and persons in control of premises, to control the risks associated with legionella in order to protect employees and others who may be affected by their operational activities.

4.2 It is therefore important that the Association develops, implements and monitors suitable management systems in order to risk assess possible sources where legionella bacteria may grow, based on relevant and recorded statistical evidence, and where reasonably practicable to provide appropriate control measures to reduce the risk of harm resulting from such sources.

4.3 The Association will use the legionella risk assessments to determine programmes for routine inspection and testing of water systems, including, where required a programme of modification to any deficient systems and equipment,

4.4 Ensure that dwellings left vacant for extended periods of time have a suitable drain down or flushing regime is put in place to prevent potential build-up of risk conditions.

4.5 Maintain records of risk assessments, maintenance, inspection and testing and retain such records for a minimum of five years

4.6 Keep all relevant staff adequately trained in practices and procedures in respect to the control of legionella.

4.7 The Association may engage suitably competent and qualified Consultants/Contractors to determine the appropriate control measures required for premises under its control.

Competency Checks for Consultants/Contractors will include:

(i) Experience of undertaking Risk Assessments in accordance with ACOP L8,
(ii) Qualifications of staff members,
(iii) Written Statement that the company comply with the Water Management Society and British Association of Chemical Specialists Code of Conduct,
(iv) Accreditation to ISO 9001: Quality Management Systems.

5.0 Risk Assessment

5.1 A Risk Assessment process will be undertaken by competent and suitably qualified Consultants/Contractors acting on behalf of the Association to identify and determine where reasonable and practicable where conditions may be present that encourage legionella bacteria to proliferate and multiply.

5.2 The Risk Assessment process will be used to identify premises controlled by the Association where:

(i) Due to the nature of the water systems installed in the premises there is a likelihood that the risks associated with legionella bacteria may be increased, giving rise to potential exposure to building occupants, or other building users.

(ii) The occupants of the premises can be identified as a recognised 'at risk' group as described in the ACOP, (e.g. elderly, immunosuppressed, ill-health, smokers).

It should be noted that 'at risk' groups can only be identified where this is reasonably practicable and it is not considered possible, or appropriate, for the Association to seek detailed medical information from tenants.

6.0 Legionella Management Plan.

6.1 The Association's Legionella Management Plan (LMP) outlines the approach the organisation aims to take to assess the risks associated with legionella is attached as Appendix One to this document.

6.2 The outcomes from legionella risk assessments will be used to identify programmes of routine inspection, monitoring, testing and treatment of water installations. Recommendations provided by Consultant(s)/Contractor(s) engaged by the Association must be reasonable, practicable and cost effective, taking into account the level of risk, exposure group and resources available.

6.3 Any monitoring and treatment regime(s) implemented by the Association will be subject to regular reporting, dependent on testing and treatment intervals, by the responsible Contractor. These reports will be reviewed by the Projects Officer on a six monthly basis to assess the affectiveness of the regime.

6.4 The Projects Section in conjunction with the appointed Consultants/Contractors may review and revise the frequency of any testing and treatment regimes where this is considered appropriate. Any changes must be clearly documented and the LMP updated accordingly.

6.5 The policy shall be implemented through the issue of a Legionella Management Plan and all relevant staff, consultants and contractors are responsible for following the requirements of the plan as set out in appendix 1.

7.0 Emergency Response.

7.1 In the event of legionella bacteria being identified through active or reactive monitoring, the following process will be followed:

- The relevant Consultant/Contractor will inform the Project Section

immediately by telephone identifying the site, location and remedial action to be taken and then follow this with email confirmation.

- The Project Section will arrange for the immediate isolation of any specific services as per the Consultant/Contractors instructions. This will mean physically isolating and preventing access where necessary, eg a shower room.
- The Project Section will then arrange for the specified remedial works to be completed as soon as is practical by an approved contractor. Ensuring that the contractor is provided with written confirmation that the system is contaminated and they will need to take suitable precautions to ensure their employees and others who may be affected are not exposed to harm.
- The relevant contractor to provide a risk assessment and method statement detailing how they will protect their employees, and others who may be affected, from the risk of exposure before commencing work.
- On completion of any remedial work, a further water sample should be taken. Thereafter a sample should be taken for the following three months.

8.0 Equal Opportunities Testing.

8.1 In accordance with the Association's Equality & Diversity Policy, this Policy has been consciously considered to judge whether there is any likelihood that its presentation or operation could in any way lead, no matter how inadvertently, to discrimination. The conclusion of this exercise is that it is believed that the Policy should operate in a non-discriminatory way.

9.0 Policy Review.

9.1 This policy will be reviewed in five years' time, or sooner if legislative, regulatory or best practice changes require this.

APPENDIX 1. LEGIONELLA MANAGEMENT PLAN – updated May 2017

AREA	RISK PRIORITY	REASON FOR RISK PRIORITY	ISSUES TAKING FORWARD	ACTION TO BE CONSIDERED	CURRENT POSITION @ May 2017	FURTHER ACTIONS TO BE TAKE FORWARD
PHASE 1						
Primrose Ct & Northinch Ct.	1	Readily identified vulnerable group	Minimal as group identified and properties self-contained. Current water management procedures are suffice.	Re-evaluate water management regime annually	Contractor appointed and testing regime in place. Regime covers hot and cold water systems and shower cleans. Testing undertaken quarterly.	Continue regime
Amenity housing (7&9 Methil Street)	1	Readily identified vulnerable group	Group identified and properties self-contained. Current water management procedures are suffice.	Re-evaluate water management regime annually	Contractor appointed and testing regime in place. Regime covers hot and cold water systems and shower cleans. Testing undertaken quarterly	Continue regime
Supported housing-- Loretto Housing & Church of Scotland properties	1	Readily identified vulnerable group	No works required	No works required	No water management regime in place as risk associated with these properties is minimal. WSHA have no control or detailed information on the tenants who occupy these properties as this is the responsibility of the Managing Agents.	No further action required
Adapted flat at 1195 Dumbarton Rd (0/2)	1	Readily identified vulnerable group	Single adapted flat for disabled person. Issues minimal as group identified and properties self-contained.	Identify other adapted housing within Association's stock base. Appoint contractor and carry out risk assessment. Take any action necessary, identify regime required and put in place.	A contractor appointed and testing regime in place. Regime covers hot and cold water systems and shower cleans. Testing undertaken quarterly.	Continue regime
PHASE 2						
Cold water storage tanks,	4	Majority of our stock is tenemental	Issues timescale and cost related i.e. in relation to identification, inspection,	Internal desktop analysis across contracts to identify properties with cold water	In 2008-2009 a survey and written report on condition of all water tanks was undertaken by John Gunn Plumbers. The same process	Pentran to confirm if any further work required in the future.

including tower block at 64 Curle St and WHSA/WCL offices		therefore some tenants including potentially vulnerable individuals may be exposed to risk via communal cold water storage systems. Although it is considered unlikely due to the daily water throughput and resultant limited likelihood of stagnation within tanks to be a limited risk, we have no information on the condition of our tanks in relation to linkages, insulation and enclosure.	remedial action and then potential ongoing inspection regime. Statistical evidence would indicate that the risk associated with domestic premises is minimal.	storage facilities. Risk Assessment to be undertaken to determine any further action required.	was completed at WHSA/WCL offices by Rankin Environmental and at 64 Curle St by Cofely Ltd. Some remedial work was undertaken to fit lids and insulate some tanks. In addition, a desktop analysis was undertaken by Association staff and Pentran to identify if any other remedial works were required. As there was a very limited risk of a legionella issue occurring only a small number of properties were identified for a tank clean and this work is now complete. 64 Curle St has a Water Management regime in place which is carried out by ENGIE. The pipework in the MSF was highlighted in the stock condition report which was carried out in conjunction with the stock transfer. The Association need to make a decision on whether this should be done or not.	Pentran consider that no further work requires to be undertaken in this area. The level of risk associated with cold water storage tanks in domestic properties owned by the Association is extremely low. MSF - the main cold water tanks get tested and cleaned ongoing basis by ENGIE This will be assessed through the stock condition surveys 2017

Voids	5	Potential for stagnation to occur, particularly in long-term voids.	Resources internally i.e. who will carry out regular flushing of systems etc. Ensuring that void contractor removes or caps dead legs. Access & access for inspection regime.	Ensure that in void contract where heating and hot water systems are replaced the contractor removes or caps deadlegs. Risk Assessment to be undertaken to determine any further action required.	Repairs and Factoring Section manage the technical management of voids. Our current Void Policy now states that: Where properties are void during the winter period (November-end February), the Association will ensure the gas, electricity and water supply is shut off and drained down in the interest of health and safety and to reduce the possibility of flood damage. It also states that any instantaneous electric shower should be included in the electric check. Only showers in an acceptable condition will be adopted and maintained by the Association. All hot and cold water outlets and any shower to be retained will be flushed before letting.	Repairs, Factoring & Support Services Section to ensure that void contract states that where heating and hot water systems are to be replaced the contractor removes or caps deadlegs.
PHASE 3						
Showers	6	Potential for risk if showers not used regularly. Potential also that these may be the more vulnerable groups-due to	Being able to identify where showers have been installed due to poor record keeping in the past. This requires to be resourced. Also, access & access for inspection regime will be a factor.	Identify (where practical) all showers owned and maintained by the Association by checking records and Stage 3 information over last 3-5 years. Risk Assessment to be undertaken to determine any further action required.	All stage 3 adaptions now undertaken since 2002/03 recorded on work completion sheets.	H&S consultant advised that no further action is required in this area. The level of risk is not considered practicable and reasonable to warrant the allocation of the resources required to determine whether each individual tenant

						where a Stage 3 adaptation has been carried out could be considered to more susceptible to legionella infection than a tenant in a non-adapted property.
Other housing /hot water storage !	7	Potential for hot water storage systems to be operating below 40 degrees.	Identifying all hot water storage systems on a contract-by-contract basis. Resources to be assessed against level of risk. Statistical evidence would indicate that the risk associated with domestic premises is minimal.	Internal desktop analysis across contracts to identify properties with hot water storage facilities. Risk Assessment to be undertaken to determine any further action required.	The Association has hot water storage facilities in all of its electric heated properties, together with the communal heating systems at 6 & 8 Methil Street and the Neighbourhood Centre. A decision has to be made on how we approach the tenemantal properties where cold water storage tanks are still live. This would involve significant resources, taking on board that access to individual flats is required to ascertain if it is being fed by the CWS tank. We will also have to take into account that owner occupier involvement will play a part in this complex issue.	Consultants carried out risk assessments and consider that no further action is required. Risk assessments to be reviewed and remedial works carried out thereafter.
Deadlegs	8	Potential for stagnation to occur.	Unable to identify all deadlegs without extensive invasive inspections, which is cost and resource prohibitive.	Ensure that in all future contracts where heating and hot water systems are replaced the contractor removes or caps deadlegs.	Not taken forward to date. Will be included within future planned programmes or where identified through repairs or void works.	This will be included within future planned programmes or where identified a clause will be included in the

						specifications noting that each installation will be required to comply with the HSE Approved Code of Practice & L8 Guidance