

Legionella Policy (5)

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 6 TH February 2008
Last review	June 2017
Last Review	May 2022
Next Review	August 2027

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 domestic 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 Dutyholder.
- 1.5 Director of Property Services 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 Office are the Responsible persons with responsibility 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 cooling systems with Cooling Towers, evaporative condensers, dry/wet cooling systems, hot and cold water systems, spa pools, other plant which can create aerosols (i.e vehicle wash) and where the systems or systems have not been managed or controlled properly within the scope of the ACOP L8

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. (4th Edition 2013)
- 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.
- BS8580-1:2019 – Water Quality – Risk Assessments for legionella Control – Code of Practice
- The Water Supply (Water Fittings) (Scotland) Byelaws 2014

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 (ACOP) L8 – Legionnaires Disease: The Control of Legionella Bacteria in Water Systems. (4th Edition 2013) 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 a weekly 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 of Compliance that the company comply with the Legionella Control Association 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 L8, (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 effectiveness 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, and analysed by a UKAS accredited laboratory with the current ISO standard methods for the detection and enumeration of legionella within the scope of their accreditation. 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 July 2022

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 Court.	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 for existing tenants but consider removing service as property no longer classified as sheltered
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 for existing tenants but consider removing service as property no longer classified as sheltered
1151 -1175 Dumbarton Road Stock Transfer Properties	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 for existing tenants but consider removing service as property no longer classified as sheltered

2-8 Northinch Court Stock Transfer Properties	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 for existing tenants but consider removing service as property no longer classified as sheltered
90-96 Northinch Street Stock Transfer Properties	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 for existing tenants but consider removing service as property no longer classified as sheltered
PHASE 2						
Cold water storage tanks, including tower block at 64 Curle St	4	Majority of our stock is tenemental therefore; some tenants including potentially vulnerable individuals may be exposed to risk via communal cold-	Issues timescale and cost related i.e. in relation to identification, inspection, remedial action and then potential ongoing inspection regime. Statistical evidence would indicate that the risk associated with domestic premises is minimal.	Internal desktop analysis across contracts to identify properties with cold water storage facilities. Risk Assessment to be undertaken to determine any	In 2008-2009 a survey and written report on condition of all water tanks was undertaken by John Gunn Plumbers. The same process 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	Pentran to confirm if any further work required in the future. Pentran consider that no further work requires to be undertaken in this area. The level of risk associated with cold water storage tanks



		<p>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.</p>		<p>further action required.</p>	<p>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.</p> <p>64 Curle St has a Water Management regime in place which is carried out by ENGIE/EQUANS now Wheatley Group.</p> <p>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.</p>	<p>in domestic properties owned by the Association is extremely low. MSF – the main cold water tanks get tested and cleaned ongoing basis by Equans (part of Engie Group)</p> <p>This will be assessed at the next planned stock condition 2023/24.</p>
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