



**Drumchapel
Housing**

Co-operative Limited

Control of legionella policy

Approved by Board

Due for review

October 2017

October 2020

1.0 Introduction

- 1.1 This Policy sets out the steps that the Co-operative will take to comply with our legal duties concerning the control of legionella and has been written in accordance with the Approved Code of Practice and guidance for the control of legionella bacteria within water systems.
- 1.2 The policy relates to the Co-operatives domestic premises and offices and is designed to protect tenants, staff, visitors, contractors and other building users from risks associated with Legionnaires' Disease.

2.0 Aims of the policy

- 2.1. The key aim of this policy is to effectively control the risk of legionella within our properties and meet our legal obligations in relation to health and safety. To achieve this, we will:
- appoint a 'responsible person' to obtain competent health and safety advice and guidance
 - identify and assess sources of risk by carrying out appropriate legionella risk assessments which will be reviewed at appropriate intervals or when changes take place to the water system or use of a building.
 - prepare a written scheme for preventing or controlling risks identified
 - implement, manage and monitor control measures to ensure that they remain effective
 - keep records of the precautions and steps taken in accordance with the implementation of the written scheme, including maintenance, inspection and testing for 5 years
 - provide employees with suitable and sufficient information, instruction, and training
 - provide appropriate advice and guidance, including steps to help reduce the risk of legionella

3.0 Legislative framework and guidance

- 3.1 The following legislation and guidance are relevant to this policy:
- Health and Safety at Work etc Act 1974
 - Control of Substances Hazardous to Health Regulations 2002
 - Management of Health and Safety at Work Regulations 1999.
 - Legionnaires' disease: The control of legionella bacteria in water systems. Approved Code of Practice (L8) 2013
 - HSG274 Legionnaires' disease Technical Guidance 2014

4.0 Legionnaires' disease

- 4.1 Legionnaires' disease is a potentially fatal form of pneumonia and everyone is susceptible to infection. The disease is normally contracted by inhaling small droplets of water (aerosols), suspended in the air, containing the bacteria. Risk generally increases with age, but some people are at higher risk, e.g. people over 45, smokers and heavy drinkers, people suffering from chronic respiratory or kidney disease, diabetes, lung and heart disease or anyone with an impaired immune system.
- 4.2 Legionella bacteria are widespread in natural water systems, e.g. rivers and ponds. However, the conditions are rarely conducive for people to catch the disease from these sources. Outbreaks of the illness occur from exposure to legionella growing in purpose-built systems where water is maintained at a temperature high enough to encourage growth, such as within hot and cold-water systems in domestic and non-domestic properties.
- 4.3 To control the risks, it is essential to introduce measures which do not allow proliferation of the organisms in the water systems and reduce, so far as is reasonably practicable, exposure to water droplets and aerosol.

5.0 Responsible person

- 5.1 In order to comply with our legal duties concerning the control of legionella, the Co-operative will appoint an appropriate qualified consultant to:
- carry out risk assessments
 - develop a written scheme for preventing or controlling risks, where identified
 - review risk assessments, arrangements and procedures
 - provide information and advice

6.0 Risk assessments

- 6.1 Specific legionella risk assessments will be carried out by a responsible person and will take account of the individual characteristic of our properties, and arrangements for provision and storage of hot and cold water.
- 6.2 Schematic diagrams will be maintained to illustrate the layout of the system and components to inform the risk assessment process and allow someone unfamiliar with a system to understand the relative positions and connections of components quickly.

- 6.3 Key considerations of the risk assessment will include aspects that create conditions suitable for growth of the organisms, such as:
- water temperatures between 20 °C – 45 °C
 - sources of nutrients, such as sludge, scale, rust, algae, other organic matter and biofilms
 - a means of creating and spreading breathable droplets, e.g. aerosol generated by showers and taps
 - the presence (and numbers) of people who may be exposed, especially in premises where occupants are particularly vulnerable, e.g. healthcare, residential and nursing homes.
- 6.4 The risk assessment will review any existing control measures, identify emerging risks and steps required to eliminate or control the risk of legionella, as appropriate, including monitoring arrangements.
- 6.5 The risk assessment is a live document and should be reviewed every 2 years or when changes take place that affect its validity, such as:
- changes to the water system or its use
 - changes to the use of the building in which the water system is installed
 - the availability of new information about risks or control measures
 - the results of checks indicate that control measures are no longer effective
 - changes to key personnel
 - a case of legionnaires' disease/legionellosis associated with the system.

7.0 Typical control measure

- 7.1 Steps taken to control the risk of legionella will vary, depending upon a range of factors, including property design, use and occupancy, together with the specifics of the hot and cold-water installation. However, typical control measures include:
- disconnection of cold-water storage tanks, where possible
 - annual inspection of cold-water storage tanks
 - clean and or disinfect water storage systems, where appropriate
 - insulate cold water storage tanks and pipework
 - annual maintenance and service of thermostatic mixer valves
 - ensure that hot water is stored at 60 °C
 - ensuring that hot water circulates at temperatures greater than 50 °C
 - ensure that cold water circulates at temperatures lower than 20 °C
 - disconnect dead legs in pipework

- ensure that infrequently used outlets are flushed on a regular (weekly) basis
- provide information and guidance to tenants concerning legionella and steps to take to reduce risk, including cleaning shower heads and running outlets on a regular basis

8.0 Written control scheme

8.1 Where the risk of legionella has been identified, a written scheme for controlling the risk of exposure will be developed, implemented and managed. This will include control measures that prevent the growth of legionella bacteria in the system and reduce exposure to water droplets and aerosols.

8.2 The written scheme should include, where appropriate, and with reference to the risk assessment:

- a schematic diagram showing the layout of the plant or water system
- a description of the correct and safe operation of the system
- control measures to be taken
- checks and frequency to be carried out to ensure the written scheme is effective
- remedial action to take if the written scheme is shown to be not effective, including emergency procedures
- responsibilities for implementation and monitoring

9.0 Records

9.1 All appropriate records relating to the control of legionella will be maintained for 5 years. These will include:

- the name and position of the person or people who have responsibilities for implementing the written scheme, together with their respective responsibilities
- the risk assessment and any significant findings
- the written scheme of actions and control measures
- details about the state of operation of the water system
- the results of any monitoring inspection, maintenance, tests or checks carried out, including dates and signatures of personnel
- a log of visits by contractors, consultants and other personnel
- training records of personnel

10.0 Training and competencies

- 10.1 To meet our statutory duties, only appropriately qualified consultants and contractors will be appointed.
- 10.2 All staff concerned in the management of legionella will be provided with appropriate training, in accordance with their duties and responsibilities.

11.0 Notifications

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

12.0 Equality and diversity

- 12.1 The Co-operative's Equality and Diversity policy outlines our commitment to promote zero tolerance to unfair treatment or discrimination of any person or group of persons particularly on the basis of any of the protected characteristics. This includes ensuring that everyone has equal access to information and services and, to this end, the Co-operative will make available a copy of this document in a range of alternative formats including large print, translated into another language or by data transferred to voice.
- 12.2 We are also aware of the potential for policies to inadvertently discriminate against an individual or group of individuals. To help tackle this, the Co-operative applies a screening process to policies. This is based on the recommendations of the Equality and Human Rights Commission, to ascertain whether each policy requires an Impact Assessment to be carried out. The screening process was applied to this policy and it was determined that an impact assessment is not required.

13.0 Policy review

- 13.1 This policy shall be reviewed every three years or sooner as deemed necessary by the Board.