



Provanhall Housing Association Limited

POLICY

Legionella Management Policy

AUTHOR
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DRAFTED	APPROVED	NEXT REVIEW
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1. Introduction

Provanhall Housing Association (PHA) is a community based not-for-profit organisation located in the Provanhall area of Easterhouse. The Association is run by an elected and voluntary Management Committee. Policies of the Association are agreed and approved by the Management Committee with the implementation of these policies the responsibility of staff.

The purpose of this policy is to ensure that Provanhall Housing Association effectively manages the control of Legionella within the Association's housing stock and commercial premises (office).

2. Policy Context

Legionella bacteria is common in natural water course such as rivers and ponds. Since legionella are widespread in the environment, they may contaminate and grow in other water systems such as cooling towers, evaporative condensers, showers, spray apparatus and hot and cold water systems.

Legionella bacteria are usually associated with larger water systems, for example in factories, hospitals and hotels but the bacteria can also populate smaller water systems used in homes or residential accommodation. Further potential sources of legionella bacteria include spa and whirlpool baths, humidifiers, water features and fire suppression systems (sprinklers and hose reels).

Legionnaires Disease is a potentially fatal form of pneumonia caused by the inhalation of legionella bacteria. This includes the most serious legionnaires' diseases, as well as the similar but less serious conditions of Pontiac Fever and Lochgoilhead Fever. The bacteria is normally contained within fine water droplets (aerosol) that may be caused by operating a cooling tower, shower, spray apparatus, running a tap outlet or operating a humidifier. There is no evidence that Legionnaires Disease can be contracted from person to person or by drinking water contaminated by legionella bacteria.

Legionnaires Disease has the potential to affect anybody. However, persons more susceptible are normally in the age range of 45 and above, smokers, heavy drinkers, persons suffering from chronic respiratory or kidney disease and persons with impaired immune systems.

Healthy persons are not immune from catching Legionnaires Disease. A large proportion of reported cases of Legionnaires Disease within the UK each year are those returning from foreign travel. The identification of legionella bacteria within a water system is NOT an outbreak, this is ONLY the case when two or more persons have contracted the disease from the same source.

Legionella survive low temperatures and thrive at temperatures between 20-45OC if the conditions are right, e.g. if a supply of nutrients is present such as rust, sludge, scale and other bacteria. The legionella bacteria are killed by high temperatures.

3. Policy Objectives

The Legionella Management Policy aims to ensure that the Association effectively administers compliance with its landlord obligations in respect of legionella management and thereby seeks to provide assurance to the Association's Management Committee. The main objectives of this policy include:

- Ensuring that systems are in place to enable the Association to comply with its duties in relation to Health and Safety;
- Operate an effective legionella management system;
- Ensuring an audit trails exist within the legionella management process;
- Reviewing policies, procedures and systems regularly to ensure they are up to date and reflect current best practice guidance and legislation;
- Identify all water plant and systems which present a potential risk of exposure to legionella bacteria;
- Monitor compliance with the written scheme and review risks and the performance of the risk control measures, revising risk assessments and written control schemes as required;
- Employ only competent, adequately qualified and trained personnel and service providers.

4. Legislation and Best Practice

The Association's Legionella Management Policy should be considered alongside relevant legislation; guidance and best practice, particularly the current editions of:

- The Health & Safety at Work Act 1974;
- British standards 8580:2010- water quality: risk assessment for legionella
- Management of Health and Safety at Work Regulations 1999;
- Control of Substances Hazardous to Health Regulations 2002;
- INDG 458 legionnaires disease- a brief guide to duty holders
- Approved Code of Practice L8, Legionnaires' Disease, The Control of Legionella Bacteria in Water Systems 2013;
- HSG274 Legionnaires' Disease (Parts 1-3, where relevant)
- The Housing (Scotland) Act 2014;
- Public Health (Scotland) Act 2008;

In terms of the Scottish Social Housing Charter, the Scottish Housing Regulator has identified a number of key indicators relevant to housing maintenance by which it will measure landlord performance, including the following:

- Meet the Scottish Housing Quality Standard (SHQS)
- That tenants' homes are well maintained, with repairs and improvements carried out when required, and tenants are given reasonable choices about when work is done.
- Tenants, owners and other customers receive services that provide continually improving value for the rent and other charges they pay.

5. Equal Opportunities

Provanhall Housing Association is an equal opportunities organisation. The Association's Equality and Diversity Policy seeks to ensure that all suppliers are treated equally. This Policy will not unfairly discriminate against any suppliers, individual, or group of persons dealt with under the Policy on the grounds of:

- Race, ethnicity, national or social origin.
- Disability including physical, learning or mental health.
- Gender or marital status.
- Sexuality or sexual orientation.
- Religion, religious beliefs or opinions such as political opinions.
- Age, appearance or financial status.

PHA wishes to ensure there are no barriers in accessing its services. Relevant documents can be translated into a range of languages or formats on request. We will also make available translation services for those who wish more detailed information and to assist those who wish to make personal enquiries. For anyone with visual or hearing problems, documents can also, on request, be made available in larger print, on tape, in Braille or on any other format required.

All suppliers will be required to accept the association's Equalities Policy or to have developed policies of their own which are acceptable to PHA.

Any complaints received in relation to breach of this policy will be addressed via the Association's Complaints Policy.

(Cross reference: Equality and Diversity policy, Complaints policy)

6. Complaints

The Association has a Complaints Policy and Procedure which explains how tenants or suppliers who are dissatisfied with the operation of any service PHA provides may make a formal complaint to the Association. This policy also includes an appeals process.

(Cross reference: Complaints Policy)

7. Delegated Authority

The overall control of the Technical Services function rests with the Management Committee, however, delegated authority for monitoring and evaluating the performance of the development function has been passed to the Technical Services sub-committee.

(Cross reference: Standing Orders)

8. Responsibilities

As an employer and a landlord in control of premises, the Association must:

- Identify, assess and minimize sources of risk;
- Prepare a scheme for preventing or controlling the risk;
- Implement and manage the scheme;
- Keep records and check what has been done is effective

The Association will monitor the implementation of this policy to ensure that it is properly operated and that there is effective scrutiny of the Legionella Management Policy.

The L8 ACoP requires that as part of our Management Policy certain roles are defined, the following persons have responsibilities under this policy:

Role	Name	Function / task	Responsibility
Duty Holder	Provanhall Association Management Committee	Legal duty holder for Health and Safety	Corporate responsibility to ensure that Association are implementing and complying with legal Health and Safety obligations.
Responsible Person	Director	Overall corporate responsibility	Corporate responsibility to ensure that Association are implementing and complying with legal Health and Safety obligations.
Deputy Responsible Persons	Technical Services Manager	Overall management & delivery for legionella management	Technical Services Manager responsible for the operational procedures that reflect the principles set out within the Legionella Management Policy. Ensure day to day work functions for this policy and implemented.
Risk Assessments and L8 works	Legionella Contractor	Provide specialist services in relation to the management of legionella	Undertake the required Risk Assessments, mitigation and monitoring measures as required under their appointment

9. Assessing the Risk

Provanhall Housing Association shall undertake the necessary steps to assess sources of risk across our assets. To achieve this we shall carry out a suitable and sufficient assessments to identify, assess and minimize the risk of exposure to legionella bacteria from the water systems contained within our properties.

We shall ensure that the risk assessment identifies and evaluates:

- The particular means of preventing exposure to legionella bacteria; or
- If prevention is not reasonably practicable, the particular means of controlling the risk from exposure to legionella bacteria;
- The risk to health, whether the potential harm to health from exposure is reasonably foreseeable, unless adequate protections are taken;
- The necessary measures to prevent, or adequate control, the risk from exposure to legionella bacteria.

Where required the Association shall employ the services of a competent person to undertake the risk assessments.

The risk assessment shall take into account the following factors:

- Evaluate the nature of each site;
- Consider the whole system, and not individual parts of the system;
- Presence of legionella bacteria;
- Conditions suitable for growth of the organisms, e.g. suitable water temperatures 20°C – 45°C; and presence of nutrients such as sludge, scale, rust, algae or other organic matter;
- Are these means of creating and spreading breathable droplets, e.g. the aerosol generated by cooling towers, shower or spa pools;
- The presence of occupants that would be classes as vulnerable, including quantifying the numbers;
- The source of system supply water;
- Possible sources of contamination;
- Plant operating characteristics;
- Unusual, but foreseeable operating conditions;
- Use of disinfection systems;
- Review of control measures;
- Local environment.

10. Long Term Void Properties

Where a property is taken out of occupation for prolonged period of times, it should be managed to prevent microbiological growth. In general we should aim to leave systems filled with water. By leaving the systems filled with water we remove the risk of pockets of water left in drained down system from developing biofilm and help to prevent failures in the systems associated with drying out.

When the property is to be re-occupied, these water systems should be re-commissioned as if they were new; including flushing, cleaned and disinfection; before being returned to use.

11. Training and Competence

An assessment shall be undertaken to assess the training requirements of the persons with responsibilities under this policy. Training should be undertaken by each relevant person to ensure that they have the requisite knowledge and competence to undertake their appointed role.

The Association shall retain a record of all training undertaken in relation to the management and control of legionella. Refresher training should be undertaken on a periodic basis, particularly where changes to Regulation, Approved Codes of Practice or best practice occurs.

Where the Association appoints a contractor to undertake water hygiene works, this contractor shall be required to demonstrate its competence to undertake the required tasks. As a minimum requirement, contractors are required to be a registered member of the Legionella Control Association (HCA).

12. Record Keeping

The Association understand the importance of accurate record keeping, and shall undertake the following in relation to the management of legionella within our properties:

- The Association shall maintain a record of all legionella risk assessments which have been carried out;
- The Association shall maintain a record of all mitigation/risk reduction works carried out;
- The Association shall maintain a record of all monitoring and checks that are carried out, these should be recorded within each properties log book;

The process of record keeping shall be constant in accordance with the timescales set out within in the Legionella Management Plan. All legionella records shall be retained for a minimum period of five years.

13. Notification Requirements

In Scotland under the Public Health (Notification of Infectious Diseases) Regulation 2010 human diagnostic laboratories must notify Health Protection Scotland of microbiologically confirmed cases of Legionnaires' disease.

An outbreak is defined as two or more cases where the onset of illness is closely linked in time and where there is epidemiological evidence of a common source of infection, with or without microbiological evidence.

Where an outbreak is identified the Local Authority shall implement their infectious diseases incident plan to investigate the outbreak, the Local Authority shall appoint the Proper Officer whose primary purpose is to protect public health.

Where an outbreak has occurred from suspected infringements of the regulations, then the enforcing authority shall investigate and take appropriate enforcing action. Enforcing authority shall be HSE or Local Authority Environmental Health Officers.

If an outbreak was identified that involved PHA properties, the Association would liaise with and assist the Local Authority investigation. Where a water system in the ownership of PHA was implicated within the outbreak investigation, immediate emergency treatment works of that system would be instructed.

Should an employee of the Association contract legionellosis resulting from work relating to cooling towers or hot water systems which are suspected to be contaminated with legionella, the Association shall report the incident under Reporting or Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR)

10. Policy Review

The Policy and related procedures will be reviewed 3 years from the date of approval, or earlier should the need arise to reflect changing circumstances or changes in legislation or good practice standards. The next review will take place in November 2026.

11. Cross reference: Documents

Equalities Policy

Standing Orders

Asset Management Strategy

Complaints Policy

Procurement of Suppliers Policy

Health & Safety Policy



Provanhall Housing Association Limited

Legionella Management Plan

AUTHOR
Mark Quigley, Technical Services Manager

Introduction

The Approved Code of Practice - Legionnaires Disease, The Control of Legionella bacteria in water systems (L8) requires that we have a written scheme setting out the approach to be taken by the Association in controlling the risk of legionella. Within this document we have set out the approach to be taken for both domestic and commercial premises.

Precautionary Measures

The Association's primary objective is to avoid the conditions which permit legionella to proliferate and to avoid creating a spray or aerosol. It is accepted that legionella bacteria is present in most water systems, but by undertaking good housekeeping we are able to minimise the conditions in which it would be able to multiply. We shall ensure that:

- Systems are operated safely and correctly and are well maintained;
- Materials are avoided that can provide nutrient for micro-organisms;
- Nutrient is prevented from entering the systems where possible;
- The building up of sediments, scale deposits and corrosion is avoided;
- Suitable water treatment programmes are implemented where it is appropriate and safe to do so;
- Stagnation of water is prevented;
- Water is stored below 20°C or above 60°C;
- Water is distributed below 20°C or above 60°C;

Relevant Persons/Parties

The following persons/parties have day to day responsibility for the delivery of this Plan:

Name	Role	Contact
Alan Hume Director	Responsible Person	0141 771 4941
Mark Quigley Technical Services Manager	Deputy Responsible Person	0141 771 4941

DOMESTIC PREMISES
Legionella Management Plan

It is generally accepted that levels of legionella bacteria found in typical domestic mains water supplies are very low (normally below the detectable limit) and do not pose a serious risk providing they are not allowed to proliferate. The survival and growth of legionella bacteria are governed by a number of factors which include:

- Water temperature;
- Water retention period;
- Accumulation of sludge, scale, deposits and corrosion by-products;
- Use of unsuitable materials;
- Low levels of disinfectants and other biocide treatments;

Experience has shown that while it can be difficult to completely eradicate legionella bacteria from building water systems, the risks can be reduced to an acceptable and manageable level by the adoption of a suitable programme of system design and risk management and control.

When considering the Associations domestic properties, we can broadly split the stock into two categories;

Category 1 - Domestic direct mains fed cold water with direct fed hot water via gas combi boiler.

Category 2 - Domestic direct mains fed cold water with stored hot water via hot water calorifier (electric heated properties)

We have conducted the following assessment to establish the level of risk associated with each category:

Category 1 – Mains cold water & gas combi boiler

Property Characteristic	Property Assessment Details	Low	Medium	High
Type of water supply?	Direct Mains Supply	✓		
Occupant Characteristics?	Varied ranging from age range and health conditions*	✓		
No. occupants?	Generally between 1 – 8	✓		
Type of Heating & Hot Water system?	Gas Combi Boiler or Electric Instantaneous Water Heater	✓		
Water Temperature?	Boiler hot water set to greater than 45°C	✓		
Maintenance Regime?	Annual heating system service	✓		
Showers Present	Not all properties will have showers fitted, for purpose of assessment assumed that all have.	✓		
Spa Pools Present	Not present, any spa pools would be tenants responsibility	✓		

Category 2 – Mains cold water & hot water calorifier (electric properties)

Property Characteristic	Property Assessment Details	Low	Medium	High
Type of water supply?	Direct Mains Supply	✓		
Occupant Characteristics?	Varied ranging from age range and health conditions*	✓		
No. occupants?	Generally between 1 – 8	✓		
Type of Heating & Hot Water system?	Electric storage with calorifier		✓	
Water Temperature?	Boiler hot water set to greater than 45°C	✓		
Maintenance Regime?	Annual heating service	✓		
Showers Present	Not all properties will have showers fitted, for purpose of assessment assumed that all have.	✓		
Spa Pools Present	Not present, any spa pools would be tenants responsibility	✓		

*Due to a wide range of occupants, we have based the following assessment on the assumption that tenants are not classed as vulnerable. Where specific knowledge of a customer is available which would indicate that they may be susceptible to legionella a site specific risk assessment should be undertaken.

Considering the above assessment in relation to Provanhall Housing Association's domestic stock, we can see that generally across the range of property categories there is a relatively low risk of legionella.

Risk Control Strategy - Domestic

Having considered the classifications above, we have implemented the following risk control strategies:

Low Risk Housing Stock

All of the Association's housing stock falls into this category, where properties have modern direct water supplies. To minimise the risk we shall:

- Undertake maintenance & repair of heating and hot water systems within our properties;
- When works are carried out in our properties; where it affects the water systems; specifications should include details of our requirement to ensure works remove the opportunity for stagnant water, i.e. dead legs;
- Where new works are specified within our properties, these shall be completed to comply with current water hygiene requirements.

COMMERCIAL PREMISES

Legionella Management Plan

Large commercial premises and offices with complex heating systems and irregular water usage are considered a greater risk for Legionella.

The survival and growth of legionella bacteria are governed by a number of factors which include:

- Water temperature;
- Water retention period;
- Accumulation of sludge, scale, deposits and corrosion by-products;
- Use of unsuitable materials;
- Low levels of disinfectants and other biocide treatments;

Experience has shown that while it can be difficult to completely eradicate legionella bacteria from building water systems, the risks can be reduced to an acceptable and manageable level by the adoption of a suitable programme of system design and risk management and control.

The Associations commercial stock consists of a single two storey office building constructed in 2006 and occupied by approximately 10 staff.

A separate risk assessment has been undertaken which indicates the office is low risk due to its mains fed cold water and direct fed hot water supply via two combi boilers (no stored hot water) A summary of the risk assessment is as follow:

Property Characteristic	Property Assessment Details	Low	Medium	High
Type of water supply?	Direct Mains Supply	✓		
Occupant Characteristics?	Varied ranging from age range and health conditions*	✓		
No. occupants?	Generally between 1 – 10	✓		
Type of Heating & Hot Water system?	Gas Combi Boilers (x2)	✓		
Water Temperature?	Boiler hot water set to greater than 60°C	✓		
Maintenance Regime?	Annual heating system service	✓		
Showers Present	Yes, subject to monthly temperature checks and quarterly showerhead cleans.	✓		

Risk Control Strategy - Commercial Properties

Having considered the classifications above, we have implemented the following risk control strategies:

Low Risk Commercial Premises (Office)

All of the Association's housing stock falls into this category, where properties have modern direct water supplies. To minimise the risk we shall:

- The Association shall implement a maintenance programme to ensure all appliances are serviced and maintenance to a good standard;
- When works are carried out in our properties; where it affects the water systems; specifications should include details of our requirement to ensure works remove the opportunity for stagnant water, i.e. dead legs;
- Where new works are specified within our properties, these shall be completed to comply with current water hygiene requirements;
- Undertake all risk reduction and preventative measures as identified within risk assessments;
- The Association shall maintain written records at each site documenting the risk assessment, mitigation works and monitoring. These documents should be readily for inspection.
- Undertake monthly temperature monitoring checks and quarterly cleans of any appliances with irregular use.