



CONTROL OF LEGIONELLA POLICY

This document can be made available in different formats, on request, such as Braille, large print or tape. It can also be made available in other languages as appropriate.

Cadder Housing Association Ltd.

20 Fara Street

GLASGOW

G23 5AE

Date Approved: October 2019
Approved By: Management Committee
Review Date: October 2021

ENGLISH This information is available on request in other languages, in large print, in Braille and on audio format. If you would like this information in one of these formats please contact Cadder HA on **0141 945 3282**

POLISH Niniejsze informacje dostępne są na żądanie w innych wersjach językowych, dużym drukiem, językiem Braille'a oraz w formacie audio. Aby otrzymać powyższe informacje w jednym z wymienionych formatów, proszę skontaktować się z Zespołem ds. Cadder HA pod numerem telefonu **0141 945 3282**

FRENCH Ces informations sont disponibles sur demande dans d'autres langues, en gros caractères, en braille et en format audio. Si vous souhaitez obtenir ces informations dans l'un de ces formats, veuillez contacter Cadder HA au **0141 945 3282**.

ARABIC أحرف بطباعة أخرى، بلغات الطلب تحت متوفرة ال معلومة هذه في ترغب أذت إذ اصوتي شريط على وبرايل ل بطريفة ، آبيرة أن الرجاء الصديغ، هذه من بأي ال معلومة هذه على ال حصول ل الإسكان آلا سكو جمعية سدياسة ب فريقي تفضل Cadder HA **3282** ال رقم على **0141 945**

SOMALI Warbixintaan waxaa, haddii la dalbado lagu heli karaa luuqaddo kale, daabacaad weyn, Farta ay dadka indhaha la' akhriyaan (Braille) iyo qaab cajaladdo maqal ah. Haddii aad doonayso inaad warbixintan ku hesho mid ka mid ah qaababkaas, fadlan kala xidhiidh Kooxda Xeerarka ee Cadder HA telefoonka **0141 945 3282**

Farsi پادرسثحروف ب اچاپ شکل به ديگر، های زي بان م تواند يدمي رامطالب اين صورتی در نماييد درخواستصوتی نوار روی بر و (نماييد نايبان براي) بريل حروف دفت ب الطفأ هسديد فوق های شکل از يکی به مطالب اين دريافت به مایل Cadder HA تماس تلفن شماره. آن يد حطل **0141 945 3282**

RUSSIAN Данная информация может быть предоставлена по требованию на других языках, крупным шрифтом, шрифтом Брайля и в аудиозаписи. Если вы хотите получить данную информацию в одном из этих форматов, обратитесь в Cadder HA по телефону **0141 945 3282**

Control of Legionella

Contents

- 1.0 Introduction
- 2.0 Definition
- 3.0 Policy Aims
- 4.0 Legislation
- 5.0 Risk Assessment
- 6.0 Control Measures
- 7.0 Void Properties
- 8.0 Major Repairs
- 9.0 Record Keeping
- 10.0 Training and Information
- 11.0 Responsibilities
- 12.0 Action in event of an outbreak
- 13.0 Review of policy

1.0 Introduction

- 1.1 The purpose of this policy and procedure is to outline the processes and legislative areas that should be followed in relation to the control of legionella bacteria in the water systems within property owned by the Association.

2.0 Definition

- 2.1 The Legionella bacteria is naturally occurring within environmental water sources such as rivers, lakes and reservoirs, but is usually in low numbers due to the water temperature not being favourable for growth. As they are found in the environment it is inevitable that at certain times they will enter into man-made water distribution systems such as water distribution pipe work.
- 2.2 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 similar but less serious fevers. 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.
- 2.3 Legionnaires' disease has the potential to affect anyone. However, those more susceptible are normally in the age range of 45 and above, smokers, heavy drinkers, or suffer from chronic respiratory or kidney disease or have impaired immune systems.
- 2.4 Legionella survive low temperatures and thrive at temperatures between 20-45 degrees C if the conditions are right (e.g. if a supply of nutrients is present such as rust, sludge, scale and other bacteria).

3.0 Policy Aims

- 3.1 The Association will aim to minimise and control the risk of Legionnaires' disease and will:
- Appoint a responsible person who will have a duty to put in place an action plan to minimise the risk of Legionella and to manage and monitor the necessary work systems and procedures;
 - Identify and assess sources of risk (e.g. where conditions present that may encourage Legionella bacteria to multiply or where there is a means of creating and disseminating breathable droplets), and establish any areas of non-compliance;
 - Assess the level of risk through a structured Legionella Risk Assessment programme, and aim to eliminate or reduce the risk to an acceptable level;
 - Arrange for routine inspection and maintenance of water systems, and where needed, a programme of disinfection or risk removal;

- Retain records of maintenance, inspection and testing for a minimum of 5 years.

3.2 The policy and procedure aims to ensure that a uniformed and professional approach is adopted throughout the organisation and the service delivered is compliant with legislation and best practice.

4.0 Legislation

Cadder Housing Association has several specific legal duties which relate to water safety and, in particular, Legionella risk management. These include:

- Identifying and assessment sources of risk;
- Preparing a scheme for preventing or controlling the risk;
- Implementing and managing the scheme; and
- Keeping records and checking what has done is effective.

4.2 The Policy acknowledges the Associations responsibilities to comply with the following relevant legislation and associated guidance on the control of Legionella bacteria in water systems.

- Health & Safety at Work Act 1974
- The Management of Health & safety at Work Regulations 1999
- Control of Substances Hazardous to Health(COSHH) Regulations 2002
- L8 – The Control of Legionella Bacteria in Water Systems – Approved Code of Practice and Guidance (ACOP)(4th Edition)
- HSG274 Legionnaires Disease – Technical Guidance (in 3 Parts)(2013)
- IACL27 (rev) Legionnaires Disease – A brief guide for Duty Holders (2012)
- BS8580:2010 Water Quality – Risk Assessments for Legionella Control
- Reporting of Injuries, Diseases and Dangerous Occurrence Regulations 2013

5.0 Risk Assessments

5.1 The HSE guidance note ‘Legionella and landlord’s responsibilities’ recommends that a proportionate approach should be taken to assess risk and that an in-depth detailed risk assessment is not necessarily required. The guidance note further asserts that generally the risk from hot and cold water systems in most residential buildings is low, due to the regular water usage and turnover.

5.2 An in-house assessment will be made for properties to group them into the following risk categories:

Low risk – Low risk properties might be general needs domestic premises, including houses and flats where the water systems are small scale domestic type with high turnover.

Medium risk – Examples of medium risk properties might be shared premises (commercial) with cold water system 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.

High risk – Examples of high risk properties might be healthcare or commercial properties with cooling towers or air conditioning systems.

5.3 The Association will arrange for a suitable and sufficient risk assessment programme to be carried out to identify and assess the risk of exposure to Legionella bacteria from all water system across its property portfolio.

5.4 The Association will use a competent external company with qualified Legionella Risk Assessors to carry out the risk assessment programme. The Assessment company will not normally be associated with the water hygiene / control contracting company in an attempt to ensure independent recommendations are given by the Assessor.

5.5 Risk Assessments will be reviewed on a two yearly basis or sooner should there be a reason to suspect that they are no longer valid such as in the following instances:

- Changes to the water system
- The availability of new information about risks or control measures
- The results of checks indicating that control measures are no longer effective
- An outbreak of legionnaires disease is associated with the system

6.0 Control Measures

6.1 For each risk category, a written scheme of control will be prepared to ensure the on-going safe control of the water systems.

6.2 **Low risk properties** – 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 setting 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 website and periodically in tenant newsletter. Our new tenants will receive an advice leaflet on maintaining safe water systems.

6.3 **Medium / High Risk** – Control measures will include:

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

7.0 **Void Properties**

7.1 It is recognised that all 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.

7.2 To mitigate the increased potential risk associated with voids, the trade team / estate caretakers will carry out and record the following:

- Thoroughly flush all taps
- Clean and disinfect, or replace, shower heads;
- Inspect and report on water storage tank, where present.
- Ensure any redundant pipework identified is removed
- Advising tenants of their own water hygiene responsibilities
- Testing the cold / hot water supply

8.0 **Major Repairs**

8.1 Whilst undertaking Major Repairs such as the replacement of bathroom suites, heating systems or the installation of kitchens as part of the planned maintenance programme the opportunity will be taken to carry out a whole house inspection to identify control measures that may be undertaken on a programmed basis such as the following:

- Replacement of flexi-hoses to water systems.
- Removal of redundant hot water washing machine valve connections
- Removal of dead-legs
- Insulation of above floor hot & cold water pipes

9.0 **Record Keeping**

9.1 Written control schemes will be produced to control the risks identified by the risk assessment and taking into account the minimum monitoring requirements detailed in appendix A. The written control scheme shall clearly identify the following:

- Specific actions required
- The frequency of the control measure
- Persons responsible for undertaking such actions

9.2 All records will be kept for a minimum of 5 years.

10.0 Training & Information

10.1 All employees directly involved in undertaking the legionella control measures shall receive the appropriate training to ensure they are competent to complete the tasks.

11.0 Responsibilities

11.1 The Director is the statutory duty holder and is responsible for ensuring that the legionella risk is controlled within the Association properties.

11.2 The Director shall ensure that adequate resources are available for the formulation, monitoring and recording of appropriate procedures which comply with the ACOP

11.3 They shall also ensure that adequate resources are available to provide appropriate information, instruction, training and supervision to employees identified as having a role to undertake in the implementation of legionella management procedures.

11.4 The Maintenance Manager shall be the 'Responsible Person' who will be responsible for the following

- Management Responsibility for all aspects of Legionella Control
- Ensure suitable arrangements are in place to identify all water systems owned by the Association and assess them for the potential risk of legionella infection
- Establish suitable arrangements to manage identified risk areas, including identification of management responsibilities, training and competence
- Ensure that adequate resources are available to address any needs identified in the risk assessments
- Review the risk assessments and remedial measures implemented every two years
- Ensure that the established procedures are brought to the attention of all persons affected by them

12.0 Actions in the event of a Legionellosis Outbreak

12.1 Legionnaires disease is notifiable in Scotland under the Public Health (Notification of Infectious Disease) (Scotland) Regulations 1988. An outbreak is defined by the Public Health Laboratory Service as two or more confirmed cases of legionellosis occurring in the same locality within a six-month period.

12.2 Should an outbreak occur the statutory duty holder will ensure the following:

- Liaise with the Proper Officer from either the Local Authority or the Local Health and Safety Executive who will invoke an Outbreak Committee
- Inform the Management Committee at the earliest opportunity
- Comply with all requests for information/actions required to control an outbreak including shutting down systems, cleaning or treatment works as required by the Outbreak Committee
- Where relevant ensure the Outbreak Committee receives information relating to staff sickness records to determine any undiagnosed cases of Legionellosis related illness

13.0 Review of policy statement

10.1 This policy will be reviewed after the first year and thereafter every two years.

Appendix A – Control Measures and Inspection Frequencies

Void Properties		
Service	Task	Frequency
Hot water	Flush through hot water to all outlets.	Weekly
	The water temperature from ‘Sentinel taps’ should be at least 50 °C within one minute of running the water	Domestic Clean Handover
	The outgoing water temperature from the calorifier should be at least 60 °C and the return to the calorifier at least 50 °C	Void Gas Safety Check
	Clean and disinfect tap outlets	Domestic Clean Handover
Cold Water	Flush through cold water to all outlets.	Weekly
	The water temperature from ‘Sentinel taps’ should be at below 20 °C within two minutes of running the water	Domestic Clean Handover
	Clean and disinfect tap outlets	Domestic Clean Handover
Shower heads	Dismantle, disinfect, clean and descale shower heads and hoses.	Domestic Clean Handover
Thermostatic Mixing valves	Inspect, clean and maintain. Undertake fail safe checks	According to manufacturer’s instructions

Office Premises		
Service	Task	Frequency
Little used outlets	Flush through and purge to drain or purge to drain immediately before use, without release of aerosols	Weekly
Hot Water	The water temperature from ‘Sentinel taps’ should be at least 50 °C within one minute of running the water	Monthly
	The outgoing water temperature from the calorifier should be at least 60 °C and the return to the calorifier at least 50 °C	Monthly
	The input water temperature to TMVs should be at least 50 °C within one minute of running the water	Monthly
	Drain the calorifier checking for debris, inspect and clean as necessary	Annually
	The water temperature from a representative number of taps on a rotational basis should be at least 50°C within a minute of running the water	Annually
Cold Water	The water temperature from ‘Sentinel taps’ should be at below 20 °C within two minutes of running the water	Monthly

	The water temperature from a representative number of taps on a rotational basis should be below 20°C within two minutes of running the water	Annually
Shower heads	Dismantle, disinfect, clean and descale shower heads and hoses.	Quarterly

Additional control measures generally which may be identified at the Risk Assessment	Frequency
Removal of flexi-hoses to hot and cold water pipes	Major Repair Programme or void
Removal of redundant hot water washing machine valve and pipework	Major Repair Programme or void
Removal of dead-legs to pipework	Major Repair Programme or void
Provision of insulation to above floor hot and cold water pipes	Major Repair Programme or void
Any other measure to remove or mitigate a low risk situation	Major Repair Programme or void