

Loreburn Group  
**Legionella Policy**



**Creating Great Places to Live**

<b>Policy</b>	Legionella									
<b>Version Reference</b>	2									
<b>Approved by</b>	MC			LET				MT		
<b>Date of Approval</b>	November 2019									
<b>Review Period</b>	Every 3 Years <b>or</b> as legislation or substantive changes occur									
<b>Review Due</b>	November 2022									
<b>Policy Champion</b>	Head of Asset									
<b>Who this policy affects</b>	Staff	x	Customers	x	Contractors	x	Members of the Public	x		
<b>Where this policy affects</b>	General needs	x	Later Living	x	Supported	x	Offices/staff base	x		x

## Contents

Purpose of this Policy	Page 2
1. Legislative Background and Guidance	Page 2
2. Associated Policies	Page 2
3. Aims & Outcomes of Policy	Page 2
4. Policy Specific Information/Arrangements	Page 2
5. Background Information	Page 3
6. Management of Water Systems	Page 3
7. Responsibilities	Page 5
8. Water Quality Monitoring	Page 6
9. Record Keeping	Page 7
10. Training	Page 7
11. Complaints	Page 7
12. Risk Management	Page 8
13. Equality & Diversity	Page 8
14. Responsibilities Chart	Page 9
15. Policy Review	Page 10
16. Policy Assessment Checklist	Page 11

## Purpose of this Policy

The purpose of this policy is to ensure that Loreburn complies with the legal duties under legislation.

This policy will set out the Loreburn Group's system for the control and management of legionella bacteria in water systems within dwellings and office buildings either owned or managed by Loreburn.

### 1. Legislative Background

1.1 In preparing this policy we have taken account of:

- Health and Safety at Work Act 1974
- Management of Health and Safety at Work regulations 1989
- Control of substances hazardous to health regulations 2002 (as amended)
- Approved code of practice and guidance on regulations (L8)

### 2. Associated Policies

- Health & Safety Policy Statement
- Void management Policy
- Cyclical Compliance Policy
- Control of Hazardous Substances Policy

### 3. Aims & Outcomes of this Policy

- 3.1 Through this policy we aim to adopt the principles of control and management specified in Approved Code of Practise L8.
- 3.2 Eliminate the potential for Legionella contamination of water systems in order to prevent any danger.
- 3.3 Identify and assess sources of risk from Legionella.
- 3.4 Prepare a scheme for preventing or controlling the risk and implement, manage and monitor all precautionary control measures identified.
- 3.5 Keep records of precautionary measures.
- 3.6 Identify the responsibilities of staff, customers, contractors and visitors.

### 4. Policy Specific Information/Arrangements

- 4.1 This policy forms part of Loreburn's Health & Safety Policy and applies to all areas of activity associated with Loreburn.
- 4.2 This policy applies to all staff, customers, contractors and all Loreburn controlled premises and activities.
- 4.3 The [Procedural Guide](#) details further information on Legionella.

## 5 Background Information

- 5.1 Legionellosis is a collective term for diseases caused by legionella bacteria including the most serious Legionella's' disease, as well as the similar but less serious conditions of Pontiac fever and Lochgoilhead fever.
- 5.2 Legionnaires' disease is a potentially fatal form of pneumonia and everyone is susceptible to infection. However higher risk persons are:
- people over 45 years of age
  - smokers and heavy drinkers
  - people suffering from chronic respiratory or kidney disease
  - diabetes, lung and heart disease
  - anyone with an impaired immune system
  - For more information see <http://www.hse.gov.uk/legionnaires/what-is.htm>

## 6 Management of Water Systems

- 6.1 Under the Approved Code of Practice and Guidance on Regulations (L8) a system is recommended to be put in place that manages the risk from legionella for customers, visitors, contractors and staff. This system is required to:
- Identify and assess the risks of legionella bacteria in water systems
  - Devise a scheme for eliminating or controlling the risk
  - Manage the risk, selection and training of competent personnel
  - Keep up to date records (electronically and logbooks on site)
  - Manufacturers, suppliers' installers and users to address their responsibilities
- 6.2 The above requirements will be met by the following actions:
- Visual inspection of water storage tanks (Six monthly)
  - Clean and disinfect cold water storage tanks and all water systems fed from these (Annually)
  - Visual inspection of the hot water calorifiers (Annually)
  - Visual checks of temperatures and settings of calorifiers (Monthly)
  - Temperatures of hot and cold-water outlets at Sentinel taps (Monthly)
  - Legionella water samples taken (Annually)
  - Cleaning and disinfection of shower heads (Quarterly)
  - Flushing of infrequently used outlets (Weekly)
  - Checking other outlets on a rotational basis over 12-month period recording temperatures in a log book
  - Undertaking a risk assessment of all water storage tanks, calorifiers and associated pipework which are susceptible to colonisation by Legionella
- 6.3 The risk assessment is carried out in line with the guidelines set out in BS8580-1:2019 to include:

- An assessment of the risk to health, and identify measures to be taken
- Risk Assessment reviewed every two years. However, these risk assessments should be live and reviewed based on the following criteria:
  - a change to the water system or its uses;
  - a change to the use of the building where the system is installed;
  - new information available about risk or control measures
  - the results of checks indicating that control measures are no longer effective;
  - changes to key personnel;
  - a case of legionnaires' disease, legionellosis, associated with the system.
- Consideration of replacement/substitution to prevent the risk
- Where prevention is not reasonably practicable, engineering measures to control exposure e.g. drift eliminators
- Other measures to reduce the risk e.g. water treatment
- A management regime to ensure continual compliance and regular reviews

6.3.1 The risk assessment at each property or scheme covers the following categories:

- Management and record keeping systems
- Hot & cold down services
- Showers & aerosol generating outlets
- General water services

6.4 The risk to each category is assessed as one of the following:

- Low – Good control of water quality and therefore low
- Medium – Average control of water quality and medium risk likely requiring some short-term improvements
- High – Below average control of water quality and high risk likely requiring immediate, short- and longer-term improvements

6.4.1 The risk control system applies to the following properties owned and managed by Loreburn:

- Later Living and supported housing
- Houses in Multiple Occupation (HMO)
- Standard property – typically domestic dwelling (with pumped water and communal tanks)/void property

6.5 Relevant premises in respect of legionella risk would normally be those with 'stored water' however Loreburn recognises the potential risks associated with all properties especially where they become void and water may lie undisturbed in pipework. All risk assessments carried out and records of work undertaken under the system are maintained.

- General Stock – a programme should be created to include general stock to ensure compliance with L8/HSG 274 part 2, accurate

information should be collected on the condition of water systems within all Loreburn Properties.

- 6.6 All new build projects will be designed in accordance with the HSE's Approved Code of Practice and Guidance for the control of legionella bacteria in water systems. Prior to Handover a risk assessment will be completed to establish if there are any items that require to be added to the existing Water Quality Management programme and all details will be passed to Asset Management.
- 6.7 The findings from all risk assessments, monitoring arrangements and the results of inspections must be recorded and maintained for a period of five years.

## **7 Responsibilities**

### **7.1 Chief Executive**

- 7.1.1 The Chief Executive holds ultimate accountability and responsibility for the development and implementation of an effective legionella management system.

### **7.2 Director of Property and Development**

- 7.2.1 The Director of Property and Development is the Duty Holder for the organisation. The Duty Holder's Responsibilities are defined in the Approved code of practice and guidance on regulations (L8).
- 7.2.2 The Duty Holder holds overall responsibility for the management of the Water Hygiene Contract. Duty Holder is responsible to make sure accurate legionella risk assessments are carried out to determine whether legionella is a risk to employees, customers, visitors and others, and if so, what steps should be taken to manage that risk.
- 7.2.3 The Director of Property and Development holds responsibility for ensuring that the necessary arrangements are in place to enable the legionella management system to operate effectively and ensure compliance with legislation.

### **7.3 Head of Asset Management**

- 7.3.1 On a day to day basis the organisation is required to appoint someone to take responsibility for managing the risk of legionella that has been put in place. This person is called the 'responsible person' (RP) and he/she is required to be 'competent' in terms of having sufficient knowledge and experience to enable them to manage the system. The 'responsible person' is the Head of Asset Management.

- 7.3.2 The Head of Asset Management is the Responsible Person for the organisation. The Head of Asset holds overall responsibility for ensuring the successful delivery of the legionella management system through effective management of the contract, contractors and staff responsible for completing duties under the Legionella Control Procedure (Appendix 1).
- 7.3.3 The Head of Asset Management is responsible for the day to day management of the legionella management system, the water quality control programme and for ensuring all monitoring is up to date and appropriately recorded in line with the Legionella Control Procedure (Appendix 1).
- 7.3.4 The Head of Asset Management is also responsible for ensuring that any unfavourable tests results and arising actions are dealt with in line with the Legionella Control Procedure (appendix 1). This includes notifying LET immediately and making any necessary notifications to the HSE.
- 7.3.5 The Head of Asset Management is responsible for ensuring that all staff involved in the successful delivery of the legionella management system have appropriate training. The Head of Asset will liaise with the Head of Organisational Development and Human Resources as required.

## **7.4 Employees**

- 7.4.1 All employees involved in the successful delivery of the legionella management system (as outlined in Appendix 1) are responsible for ensuring their actions are completed correctly, on time and recorded as required.
- 7.4.2 If any member of staff is unable to carry out their actions for any reason within the given timescales, that member of staff must notify the Assistant Manager Planned and Cyclical immediately. The Assistant Manager Planned & Cyclical will ensure that suitable alternative arrangements are put in place.

## **8 Water Quality Monitoring**

- 8.1 Persons responsible for Loreburn premises, including Later Living Advisors, Supported Housing Advisors and office-based staff, are responsible for monitoring water quality at their respective premises.
- 8.2 In some circumstances, third party organisations have the responsibility of monitoring the water quality at the premises, including leased properties, HMOs, supported accommodation. These checks are monitored by Loreburn staff during the monthly estate management inspections to ensure they are being completed.



- 8.3 The following checks are undertaken by those tasked with monitoring water quality:
- Carry out periodic checks in line with the risk assessment recommendations
  - Update the site logbook with information gathered through periodic checks
  - Bring to the attention of the RP any anomalies with regard to water temperature diary checks
  - The monitoring and inspection regime comprise of works and sampling carried out by an external specialist contractor and weekly monitoring carried out by staff. The timescales and responsibilities are identified for each scheme under the system of work within the risk assessment for the premises.

## 9 Record Keeping

- 9.1 Records should be kept for a **minimum of five years**. In order to provide an audit trail and compliance with the law, the records should include:
- Details of risk assessments carried out
  - The written scheme or course of action
  - The names and responsibilities of the responsible person/s under the scheme
  - Details of the installation
  - Details of precautionary measures which have been carried out
  - Monitoring details (i.e. reports)
  - The signature of the person/s carrying out various tasks or other forms of authentication

## 10 Training

- 10.1 The Responsible Person will receive such training as necessary to ensure and maintain the required level of competence.
- 10.2 Other staff who have responsibilities for monitoring water quality will also be trained to ensure they have the required level of knowledge and understanding relevant to their work activities. Training will be organised by OD / HR after liaison with the Asset Manager.

## 11 Complaints

- 11.1 Loreburn has a commitment to valuing complaints and ensures the organisation benefits from feedback to identify areas for change or improvement.
- 11.2 Loreburn has a Complaints Policy which ensures there are robust and effective procedures in place for complaints to be properly managed and acted upon.
- 11.3 Anyone dissatisfied with the outcome of their complaint having exhausted Loreburn's complaints procedure has the right to refer the matter to the Scottish Public Services Ombudsman.

## **12 Equality, Diversity & Inclusion**

- 12.1 Loreburn aims to ensure that equality, fairness, dignity and respect are central to the way we work and how we treat our customers. We support diversity and uphold equal opportunities in all areas of our work as an employer and service provider.
- 12.2 Loreburn will not discriminate against tenants, staff, visitors, suppliers others based on their age, sex, sexual orientation, race, disability, religion or belief, marital status, pregnancy and maternity or gender reassignment (collectively referred to as 'protected characteristics' in the Equality Act 2010).

## **13 Risk Management**

- 13.1 Loreburn has a Risk Management Strategy, Policy and Procedure. These documents set out how the organisation will manage risk as an integral part of its governance and management systems, ensuring risks are identified, evaluated and controlled effectively.
- 13.2 Identifiable risks arising from this policy will be monitored and managed by the internal processes set out herein and by regular review of this and all other associated policies and procedures, ensuring risks are mitigated and Loreburn complies with all legislative requirements and regulatory and best practice guidance.

## 14 Responsibilities Chart

The below chart illustrates the responsibilities of all staff appertaining to this policy:

Responsibilities	CEO/ MC	DoPD	HOA	Assistant Manager Cyclical Compliance	All Staff
To set the policy and direction with regards to Legionella	X				
Ensure Loreburn H A staff have a robust understanding of Legionella and the associated risks		X			
Manage service, reporting and update LET quarterly			X		
Ensure actions in the Legionella Control Procedure are completed on time and actions progressed as required				X	
Carry out actions as required in the Legionella Control Procedure and keep records up to date					X
Policy Champion			X		
Ensure effective and clear communication with key stakeholders including customers				X	
Reporting concerns to Line Manager				X	
Participate in meetings and provide evidence for investigations as required				X	

Ensure complaints feedback is used to improve service			x		
Working with Head of OD & HR ensure staff have appropriate training			x		
Ensure policy is reviewed every three years or as necessary			x		
Ensure E&D guidance is adhered to		x			

## 15 Policy Review

- 15.1 The Policy Champion is the Head of Asset
- 15.2 The Policy Champion is responsible for completing the Health and Safety Assessment and Equality, Diversity and Inclusion Assessment Checklist
- 15.3 This policy will be reviewed by the Policy Champion every 3 years or sooner as required due to legislative or substantive change.

## Policy Assessment Checklist

### Health & Safety Assessment

**Does this policy have the potential to affect:**

Lone Working	Yes
Safety and/or wellbeing of customers	Yes
Safety and/or wellbeing of customers	Yes
<b>Have the above items been considered in the preparation of this policy?</b>	Yes

**Comments:**

### Equality, Diversity & Inclusion Assessment

**Does this policy have the potential to affect:**

Staff's rights to equal opportunities	No
Tenants' / Customer's rights to equal opportunities	No
Tenants' / Customer's ability to access to homes and/or services	No
<b>Have the above items been considered in the preparation of this policy?</b>	Yes

**Comments:**

### Agile Working Assessment

**Agile working requirements have been considered and addressed in the preparation of this policy:** No