



Loreburn Group

Legionella Policy

Policy	Legionella Policy					
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Policy champion	Team Manager – Property Services					



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1 Purpose of this Policy

- 1.1. The purpose of this policy is to ensure that Loreburn Housing Association (LHA) complies with the legal duties in regard to water hygiene and quality management.
- 1.2. This policy will set out the LHA system for the control and management of legionella bacteria in water systems within dwellings and office buildings either owned or managed by LHA.
- 1.3. This Policy is supported by the Legionella Procedural Guide.

2 Related Policies, Procedures & Documents

- 2.1. This Policy should be read in conjunction with the following LHA policies and procedures:
 - Voids and Reactive Repairs Policies
 - Planned Maintenance Policy
 - Cyclical Compliance Policy
 - Risk Management Policy
 - Health & Safety Policy
 - Contract Management and Performance Monitoring Policy and Procedure
 - Adverse Event Policy and Procedure
 - Contractor's Working Arrangement
 - Control of Hazardous Substances Policy
 - Procurement and VFM Policy & Procedures
 - Financial Regulations Policy
 - Standing Orders Policy
 - Alteration & Improvement Policy & Procedure
 - Aids & Adaptation Policy & procedure
 - Hot Water & Hot Surfaces Policy
 - Workplaces Policy

3 Legislative Background

- 3.1. For more information see <http://www.hse.gov.uk/legionnaires/what-is.htm>
- 3.2. 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)
- HSG 274: [Legionnaires' disease - Technical guidance \(hse.gov.uk\)](https://www.hse.gov.uk/legionnaires/legionella-landlords-responsibilities.htm)
- Approved code of practice and guidance on regulations (L8)
<http://www.hse.gov.uk/pubns/priced/l8.pdf>
- Legionella and landlords' responsibilities:
<http://www.hse.gov.uk/legionnaires/legionella-landlords-responsibilities.htm>

This list is not intended to be exhaustive, and other legislation and best practice may have been considered in the development of this policy

4 Aims of this Policy

4.1. The anticipated outcome of this policy is to:

- Adopt the principles of control and management specified in Approved Code of Practice L8.
- Minimize the potential for Legionella contamination of water systems to prevent any danger.
- Identify and assess sources of risk from Legionella via 24-monthly legionella risk assessment.
- Prepare a scheme for preventing or controlling the risk and implement, manage and monitor all precautionary control measures identified.
- Keep records of precautionary measures.
- Identify the responsibilities of staff, customers, contractors and visitors.
- Ensure compliance with respective legislation and guidance and protect the health, safety and welfare of our customers, employees, contractors and visitors.
- Promote effective communication with all stakeholders and partner agencies by highlighting the importance of water hygiene via our Social Media channels on an annual basis and during tenant signups.
- Achieve continuous improvement by setting and monitoring targets, including quarterly showerhead disinfection, temperature monitoring and legionella risk assessments, and improving performance where practicable based on customer feedback via complaints and compliments.



5 How we will achieve our Aims & Objectives

- 5.1. LHA will ensure systems are maintained under the Approved Code of Practice (ACOP) and Guidance on Regulations (L8) by managing the risk from legionella for customers, visitors, contractors and staff. This requires LHA 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.
- 5.2. Completion of 24-monthly customer satisfaction surveys following legionella risk assessments, this includes feedback from Later living Development Managers and third-party support provider. Satisfaction forms will be sent out following the completion of Legionella Risk Assessments as access is required to every property to complete.
- 5.3. Quarterly reporting to LHA's Health & Safety Executive Group on LHA's compliance with the ACOP L8 and HSG 274.
- 5.4. Legionella records kept for a minimum of 5 years to provide an audit trail and compliance with the law.
- 5.5. Monthly contract meetings with the Water Hygiene contractor to monitor contractor performance.

6 Responsibilities

Chief Executive

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

Director of Property & Development

- 6.2. 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).



- 6.3. The Duty Holder holds overall responsibility for the management of the Water Hygiene Contract. The Duty Holder is responsible for making 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.
- 6.4. 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.

Head of Property Services

- 6.5. 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 Investment and Sustainability.
- 6.6. The Head of Property Services is the Responsible Person for the organisation. The Head of Property Services 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.
- 6.7. The Head of Property Services 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.
- 6.8. The Head of Property Services is also responsible for ensuring that any unfavourable tests results and arising actions are dealt with in line with the Legionella Control Procedure. This includes notifying LET immediately and making any necessary notifications to the HSE.
- 6.9. The Head of Property Services is responsible for ensuring that all staff involved in the successful delivery of the legionella management system have appropriate training. The Head of Property Services will liaise with the People and Culture Team as required.

Employees

- 6.10. All employees involved in the successful delivery of the legionella management system are responsible for ensuring their actions are completed correctly, on time and recorded as required.
- 6.11. 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 Team Manager – Cyclical Compliance



and Head of Stock Investment & Sustainability immediately. The Team Manager – Cyclical Compliance will ensure that suitable alternative arrangements are put in place.

6.12. The chart below illustrates the responsibilities of all staff pertaining to this Policy:

Responsibilities	CEO	LET	MT	Team Managers	All Staff
To set the policy and direction with regards to Legionella	✓				
Ensure LHA staff have a robust understanding of Legionella and the associated risks		✓			
Manage service, reporting and update LET quarterly			✓		
Ensure actions in the Legionella Control Procedure are completed on time and actions progressed as required				✓	
Carry out actions as required in the Legionella Control Procedure and keep records up to date					✓
Policy Champion				✓	
Ensure effective and clear communication with key stakeholders including customers			✓	✓	✓
Reporting concerns to Line Manager			✓	✓	✓
Participate in meetings and provide evidence for investigations as required		✓	✓		✓
Ensure complaints feedback is used to improve service			✓	✓	
Working with Head of People & Culture to ensure staff have appropriate training		✓		✓	
Ensure policy is reviewed every three years or as necessary			✓	✓	
To implement processes in an efficient manner and ensure the overall approach meets the provisions of the association's Health & Safety Policy and Risk Management Policy.	✓	✓			

7 Measuring Performance



- 7.1. Performance is monitored through LHA's Performance Management Framework using the Scottish Housing Regulator Annual Return Charter Indicators, House Mark and LHA's Strategic Performance Indicators and operational performance indicators.
- 7.2. LHA will consult customers, stakeholders, and other agencies to continually measure good practice.
- 7.3. The Policy will adhere to LHA's commitment to continuous improvement and value for money.

8 Complaints

- 8.1 LHA is committed to valuing complaints and ensuring the organisation benefits from feedback provided.
- 8.2 LHA is fully compliant with the Model Complaints Handling Procedure set by the Scottish Public Services Ombudsman (SPSO). Any complainant that has exhausted internal procedures has the right to escalate their complaint to the SPSO.

9 Equality, Diversity & Inclusion

- 9.1 LHA aims to ensure that equality, fairness, dignity and respect are central to how tenants are treated. LHA support diversity and uphold equal opportunities in all areas of work, as an employer and service provider.
- 9.2 LHA will not discriminate against tenants, staff, visitors or 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)

10 Policy Review

- 10.1 The Policy Champion is Team Manager – Property Service.
- 10.2 This policy will be reviewed every 3 years or sooner due to legislative or substantive changes occurring.

