

# Legionella Policy

<b>Policy</b>	Legionella Policy						
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## 1. Purpose of this Policy

- 1.1 The purpose of this policy is to ensure that Loreburn complies with the legal duties under legislation.
- 1.2 This policy will set out Loreburn's system for the control and management of legionella bacteria in water systems within dwellings and office buildings either owned or managed by Loreburn.

## 2. Legislative Background and Guidance

- 2.1 In preparing this policy we have taken account of:
  - Health and Safety at Work Act 1974
  - Management of Health and Safety at Work regulations 1999
  - Control of substances hazardous to health regulations 2002 (as amended)
  - Approved code of practice and guidance on regulations (L8) (fourth edition, 2013)
  - HSG 274 Legionella disease part 2 - The control of legionella bacteria in hot and cold water systems
  - HSG 274 Legionella disease technical guidance part 3 – The control of legionella bacteria in other risk systems
  - Public Health (Notification of Infectious Diseases) (Scotland) Regulations 1988
  - Scottish Water Bylaws 2004

## 3. Aims 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. Associated Policies

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

## 5. Scope of Policy

- 5.1 This policy forms part of Loreburn's Health & Safety Policy and applies to all areas of activity associated with Loreburn.
- 5.2 This policy applies to all staff, customers, contractors and all Loreburn controlled premises and activities.

## 6. Background Information

- 6.1 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.
- 6.2 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>

## 7. Management of Water Systems

- 7.1 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 log books on site)
  - Manufacturers, suppliers installers and users to address their responsibilities
- 7.2 The above requirements will be met by the following actions:
- Inspection of water storage tanks (Six monthly)
  - 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 a 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

- 7.3 The risk assessment is carried out in line with the guidelines set out in BS8580:2010 to include:
- An assessment of the risk to health, and identify measures to be taken
  - Risk Assessment reviewed every two years or whenever there are changes
  - 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

7.4 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

7.5 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

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

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

7.6 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.

7.7 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.

7.8 The findings from all risk assessments, monitoring arrangements and the results of inspections must be recorded and maintained for a period of five years.

## 8. Responsibilities

### Chief Executive

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

### Director of Operations

- 8.2 The Director of Operations 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.

### Asset Manager

- 8.3 The Asset Manager 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).
- 8.4 The Asset Manager is responsible for ensuring that all staff involved in the successful delivery of the legionella management system have appropriate training. The Asset Manager will liaise with the Head of Organisational Development and Human Resources as required.

### Assistant Manager Planned & Cyclical

- 8.5 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 Assistant Manager Planned and Cyclical.
- 8.6 The Assistant Manager Planned & Cyclical 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).
- 8.7 The Assistant Manager Planned & Cyclical 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 EMT immediately and making any necessary notifications to the HSE.

### Employees

- 8.8 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.

- 8.9 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.

## 9. Water Quality Monitoring

- 9.1. Persons responsible for Loreburn premises, including Sheltered Housing Advisors, Supported Housing Advisors and office based staff, are responsible for monitoring water quality at their respective premises.
- 9.2. 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.
- 9.3. 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 comprises of work carried out by an external specialist contractor and sampling and 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.

The Legionella Control Procedure is attached at Appendix 1.

## 10. Record Keeping

- 10.1 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

## 11. Training

- 11.1. The Responsible Person will receive such training as necessary to ensure and maintain the required level of competence.

- 11.2. 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.

## **12. Policy review**

- 12.1 The policy champion is the Asset Manager.
- 12.2 This policy will be reviewed every three years or as required due to legislative or regulatory change, in particular Scottish Quality Housing Standards and EEESH.
- 12.3 This review will be completed by the Policy Champion and circulated to the Executive Management Team for approval.

## **13. Equality and Diversity**

- 13.1 There are many reasons why people may have difficulties accessing our services. These may include dyslexia, illiteracy and mental illness. It is the duty of all staff to ensure these issues are taken into account to ensure that information is appropriately communicated in ways those individuals can understand.
- 13.2 Loreburn H A is committed to equality of opportunity and will ensure that policy and procedures will not unfairly discriminate against people on grounds of sex or marital status, racial grounds, disability, age sexual orientation, language or social origin, or of other personal attributes, including beliefs or opinions, such as religious beliefs or political opinions.
- 13.3 Loreburn H A can provide:
- Translation service for those for who English is not their first language.
  - Large text or audio tapes for people who are visually impaired.
  - Assistance for people who are profoundly deaf.
  - Assistance for people who have challenges around literacy and / or numeracy

## **14. Risk Management**

- 14.1 Given the importance of these risks it is recognised that these have to be effectively managed. This will be achieved through the cyclical review of the Asset Management policies and procedures to ensure compliance with all legislative requirements and regulatory and best practice guidance.

## **15. Responsibilities Chart**

- 15.1 The chart below illustrates the responsibilities of all staff in relation to this policy.



<b>Responsibilities</b>	<b>Board/ CEO</b>	<b>D O</b>	<b>of Asset Manager</b>	<b>Assist Manager</b>	<b>All Staff</b>
To set the policy and direction with regards to Legionella	✓				
Ensure Loreburn H A staff have a robust understanding of Legionella and the associated risks		✓			
Manage service, reporting and update EMT quarterly			✓		
Take lead on applications, make day to day decisions				✓	
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 OD & HR ensure staff have appropriate training			✓		
Ensure policy is reviewed every three years or as necessary			✓		
Ensure E&D guidance is adhered to		✓			

## **Appendix 1**

### **LEGIONELLA CONTROL PROCEDURE**

#### **PURPOSE OF PROCEDURE**

This procedure details Loreburn's process for dealing with properties which are subject to legislation regarding legionella. It highlights action to be taken to comply with current legislation and outlines specific responsibilities for Loreburn staff.

The health, safety and welfare of Loreburn customers and staff are of paramount importance and all duties with regard to legionella are taken very seriously.

#### **PROCEDURE**

The Asset Management Team deal with the Legionella control systems. The Assistant Manager Planned and Cyclical is the 'Responsible Person' (RP).

#### **LEGIONELLA CONTROL PROGRAMME**

As part of Loreburn's Legionella control programme, the following works are carried out:

##### **Risk Assessment**

A risk assessment will be carried out in any of the following circumstances:

- Two years have passed from the previous risk assessment
- The use of the building has changed
- When the plant or the water system has changed
- New information is available to control a risk
- The control measures are no longer effective
- A case of legionnaires has been found or is associated with the system

The risk assessment will identify:

- How the water entered the building
- If and where the water is stored
- All water outlets in the property for example hand basins, showers, baths
- The type of fire fighting equipment fitted in the building
- Any potential areas of risk and any remedial work that is required to help control a risk

The risk assessment will outline:

- The property type
- The age of all occupants
- The gender of all occupants
- The occupants' susceptibility to the disease (level of health and if they have respiratory or any immuno-suppressant difficulties)

A record of when risk assessments are carried out and when they are expected to be required again will be kept updated by the Assistant Manager Planned and Cyclical.

Once the risk assessments and any required remedial works have been carried out, a legionella control programme will commence.

## **Water Quality Monitoring**

The precautions in the management plan will be implemented, managed and monitored and records will be kept as outlined in the Code of Practice and Guidance. This will include the following types of work:

### **Annually**

- Annual legionella sample from shower outlet (per property)
- Annual tank inspections
- Annual TVC sample from cold tank (bacteria count)

### **Six Monthly**

- Tank temperatures

### **Quarterly**

- Quarterly showerhead clean & disinfections
- Quarterly hot and cold sentinel temperatures
- Quarterly blowdown of calorifiers (if possible)

The above works will be complemented by the monthly temperature monitoring and weekly flushes of the system where necessary.

## **Site Water Quality Control Checklist**

Below are the steps to be followed to ensure water quality within properties remains safe:

- Ensure monthly temperature checks are carried out and recorded in the legionella log book provided.
- Temperatures should be taken from the hot and cold water outlets nearest to and furthest from the source.
- When recording the hot water temperature it is important to let the water run for 1 minute before the temperature is taken. The temperature should be greater than 50°C. If it is not, please contact the Assistant Manager Planned & Cyclical immediately.
- When recording the cold water temperature it is important to let the water run for 2 minutes before the temperature is taken. The temperature should be less than 20°C. If it is not, please contact the Assistant Manager Planned & Cyclical immediately.
- Communal areas that have water outlets that are little used (i.e. once per week), should be run for 5 minutes at least once a week.
- Ensure all hoses are stored on a reel and out of direct sunlight, this will minimise the pooling of stagnant water, which could be released as an aerosol during use.
- External taps being used for washing cars or watering gardens should be run for 5 minutes before attaching any hosepipes or nozzles or at least once per week.

## UNFAVOURABLE TEST RESULTS

If an unfavourable test result is received, the Asset Manager, Director of Operations and the Chief Executive must be advised immediately.

The Assistant Manager should in the first instance seek advice from the test provider regarding the implications of the test result and the location of origin.

Recommendations from the test provider must be followed and, if necessary, advise support provider and/or occupants of the building concerned to stop use of any appliances such as showers, taps, air conditioning units etc. and arrange for flushing/sterilisation and further testing until the test results are favourable and the risk has been removed.

The support provider and / or occupants should be advised when it is expected that the appliances will be available for use again following any further testing which is required, and this will be confirmed once test results are received.

If certain appliances, such as washing facilities, cannot be used, consideration should be given to providing temporary water supplies.

### Testing Process

If test results are normal after quarterly test of yearly tank disinfection:

Step 1	Keep all paperwork on file
Step 2	Key staff/on-site staff continue with monthly checks and notify Cyclical Maintenance of any abnormal results

If positive test result obtained:

Step 1	Possible positive results will be notified after <b>10 days</b> . The Asset Manager/Director of Operations/CE will be notified immediately. The customers, associated staff and Supported Housing Manager will also be informed. The possible positive area will be taken out of use. If required, temporary provisions will be made for customers.
Step 2	Additional disinfection work will be carried out by the service provider to identify the possible source. Further tests will be done.
Step 3	Results confirmed from re-test after a further 10 days from test.
Step 4	When the infected area is given the all clear, the Asset Manager/Director of Operations/CE, Support Housing Manager and related staff will be advised.

## CONFIRMED CASE OF LEGIONELLOSIS

All diseases caused by legionella are notifiable under the Public Health (Notification of Infectious Diseases) (Scotland) Regulations 1988. The first point of contact with a person displaying symptoms of a legionella related disease should be their General Practitioner.

In addition, under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR), any cases of legionellosis in an employee who has worked on cooling towers or hot and cold water systems that are likely to be contaminated with legionella must be reported to HSE.

Where a case of legionellosis is confirmed, Loreburn must report the incident in accordance Legionella Policy (Version 1)

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with Loreburn's Accident & Incident Policy and RIDDOR regulations.

In all instances, where a confirmed case is reported, the Asset Manager is to carry out a detailed investigation and provide copies of the report to the Management Committee and Chief Executive.

Where HSE carry out an investigation, Loreburn staff must co-operate with the investigating officers. Any person being interviewed by the HSE must be clear that he/she may talk in their own right and not on behalf of Loreburn unless authorised to do so by the Chief Executive.

The Responsible Person is to gather all records associated with the systems where the affected person could have been infected and retain these should there be another confirmed case in the area.

## **LEGIONELLA OUTBREAK**

An outbreak is defined as two or more confirmed cases of Legionellosis occurring in the same locality within a 6 month period.

In the event that the case has a possible link to Loreburn, the first response is to establish the location(s) where the person works or may have visited and been exposed to water droplets. In any event, a review of the findings of the most recent temperature or systems checks should be done, together with any findings of risk assessments to confirm that any identified actions have been completed.

In the event of an outbreak, the Responsible Person must:

- Identify people who may have been exposed
- Involve Public Health Authorities
- Notify the Chief Executive.

The Responsible Person may authorise or require the shut-down of any processes that are capable of generating and disseminating airborne water droplets, until sampling procedures and any remedial cleaning or other works have been done. The Enforcing Authority (Health and Safety Executive) may insist on giving final clearance to restart the system.

The Responsible Person will authorise or require samples to be taken from systems before any emergency disinfection is carried out. This is to aid any investigation into the causes/source of the outbreak. The investigating officers from the relevant agencies may take samples or require them to be taken. Confirmed infections that are attributable to the Loreburn's systems must be reported to the Health and Safety Executive under the Reporting of Incidents, Diseases and Dangerous Occurrences Regulations (RIDDOR). Such notifications will be made by the Responsible Person.

If in doubt, please liaise with the Assistant Manager Planned & Cyclical, Asset Manager and the Health, Safety & Environment Coordinator.