

## Legionella Policy

M.05

Reviewed

September 2024

Date next due for review:

September 2027

### Equality and diversity policy statement

This policy document can be produced in various formats, for instance, in larger print or audio-format; and it can also be translated into other languages, as appropriate.

Our equality and diversity policy statement describes our key equality commitments that we use to develop all organisational services; this includes employment services and services to tenants and other customers.

Our core values include providing a fair and equal service for all people and this is detailed in our Equality and Diversity Policy. Our approach to implementing this policy will reflect that commitment.

Pineview Housing Association, 5 Rozelle Avenue, Drumchapel, Glasgow. G15 7QR  
Tel: 0141 944 3891. Email: [mail@pineview.org.uk](mailto:mail@pineview.org.uk) . Website: [www.pineview.org.uk](http://www.pineview.org.uk)

The Scottish Housing Regulator Reg. No: HAC231; Registered Scottish Charity No: SC038237;  
FCA Reg. No: 2375R(S); Property Factor Reg. No: PF000151

## Contents

1. Introduction
2. Aims of the Policy
3. Legal & Regulatory Requirements
4. Duties as an Employer and Landlord
5. Key Tasks /Responsibility
6. Risk Assessment
7. Monitoring and Controlling the Risk
8. Information to Staff and Residents
9. Complaints
10. Review and Consultation

## 1.0 Introduction

- 1.1 Legionella pneumophila is the bacterium responsible for a group of pneumonia-type diseases collectively termed 'Legionellosis'. This is known as Legionnaires Disease. The diseases can be fatal or permanently debilitating.
- 1.2 The Association has a duty of care as a Landlord and Employer to ensure that our tenants / residents, visitors and staff are protected from the risk of contracting Legionnaires disease from water supplies for which we are responsible.
- 1.3 This policy sets out how Pineview Housing Association will manage Legionella, reducing the risk of a potential outbreak and residents and staff being exposed.
- 1.4 Legionnaires' Disease is usually contracted by inhaling the legionella bacteria in aerosol form, such as airborne droplets of water created by a shower, fire hose, spray tap or even a standard tap.
- 1.5 The Legionella bacteria is widespread in nature. It mainly lives in water, for example ponds, where it does not usually cause problems. Outbreaks occur from purpose-built water systems where temperatures are warm enough to encourage growth of the bacteria, e.g. in cooling towers, evaporative condensers and whirlpool spas and from hot and cold water systems.
- 1.6 Water temperatures in the range of 20 – 45°C favour the growth of Legionella in water systems. At temperatures below 20°C the bacteria will lie dormant until more favourable conditions occur, at which point they begin to multiply. It will not survive above 60°C therefore to kill the bacteria the water must be heated above 60°C. In addition to temperature control, other methods of protection include ionisation, UV light, chlorine dioxide, ozone treatment or thermal disinfection
- 1.7 A supply of nutrients is also necessary for the bacteria to thrive. These can commonly be found in water systems that are not routinely inspected or cleaned and are ageing. Nutrients include other bacteria – amoebae and algae. Sediment, scale, sludge and biofilms may help to harbour Legionella; therefore it is prudent not to allow these to build up.
- 1.8 The main risk to residents is exposure to an aerosol of Legionella infected water. Certain groups of people are known to be at higher risk of contracting Legionnaires' disease. These include immune-suppressed people e.g. cancer patients, those with chronic kidney disease, those with chronic lung disease, smokers, diabetics and alcoholics. There is a greater tendency for men to catch the disease than women, especially those over 45 years of age. (Ref: New ACOP L8 2013 Legionnaires' disease). The disease cannot be passed from one person to another.
- 1.9 This policy is supplemented by detailed working procedures which will be used by staff in implementing the policy.
- 1.10 The Association will take all reasonably practical steps to ensure the risk associated with legionella is minimised.

## **2.0 Aims of the Policy**

- 2.1 To ensure that the Association meets legislative requirements in relation to the assessment and management of the risk of legionella.
- 2.2 To ensure that Committee, staff and residents are aware of their responsibilities in relation to the management of Legionella.
- 2.3 To eliminate or reduce the risk of residents, visitors, staff and contractors contracting Legionella.
- 2.4 To establish procedures which are clear to everyone involved which will eliminate or reduce the risk.
- 2.5 To assign responsibilities to specific personnel within the Association for ensuring the Policy and Procedures are adhered to.

## **3.0 Legal and Regulatory Requirements**

- 3.1 Health and Safety Executive (HSE) Approved Code of Practice (ACOP): 'The control of legionella bacteria in water systems'. This is not an Act or a Regulation, however it has legal status and is intended to offer practical advice on how to comply with the law.
- 3.2 Health and Safety at Work Act 1974.
- 3.3 The Control of Substances Hazardous to Health (COSHH) Regulations 2002 (as amended): Legionella pneumophila is classed as a biological agent by the HSE and is listed as a Class 2 Hazard under these regulations. It is a statutory duty to prevent or control exposure to biological agents.
- 3.4 Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR): Legionnaire's disease is reportable in accordance with these regulations.

## **4.0 Duties as an Employer and Landlord**

- 4.1 The Association, as an employer and landlord, is responsible for the safety of its staff and for the maintenance of its properties and as such must undertake the following:
  - Identify and assess sources of risk
  - Prepare a scheme (or course of action) for preventing or controlling risk
  - Implement and manage the scheme and appointing a responsible person
  - Keep records and check that what has been done is effective.
  - Report any incidences of Legionella to the Health and Safety Executive in accordance with The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR)

## **5.0 Key Tasks /Responsibility**

5.1 The Housing Services Manager has strategic responsibility for legionella management.

5.2 For clarification the specific operational role / responsibility for legionella management may be delegated to other Housing Services staff by the Housing Services Manager and includes:

- To appraise any guidance or changes in regulation and make recommendations to ensure that the Association policies on this matter are up to date.
- To put in place a system of checks to ensure that the minimum of risk exists for staff in the use of the water systems within the office premises and of tenants in the use of water systems within the Association's rented properties.
- To undertake risk assessments or employ competent professionals to undertake a risk assessment on behalf of the Association.
- To ensure the implementation of the cold-water inspection procedure.
- To ensure that all necessary periodic checks and shower disinfection are undertaken and appropriate records retained in accordance with the Association's Legionella procedures and legislative / regulatory requirements.
- To implement and record the Pineview Housing Association Office inspection procedure.

## **6.0 Risk Assessment**

6.1 The main fight against Legionella is to identify the likelihood of risk within the system and take action to minimise the potential for the bacteria to survive. The Association will therefore undertake to carry out a risk assessment every **3** years or whenever the following circumstances occur:

- There has been a change to the water system within premises or its use.
- There has been a change to the overall use of the premises.
- New information or changes to the legislation related to the control and monitoring of Legionella are issued.
- Where regular checks indicate that control measures are no longer effective.
- Where a case of Legionnaires' disease/Legionellosis is associated with the system.

## **7.0 Monitoring and Controlling the Risk**

7.1 The following procedures will be undertaken to monitor and control the risk:

- A schematic diagram of the different water system and outlets within the Association's varied properties will be prepared and placed on file. This will be updated with any changes to the system.
- The key points of risk will be identified and the level of risk assessed. Regular monitoring of the systems to ensure reduced risk will be put in place.
- Water treatment chemicals will be added to the system where appropriate to ensure the cleanliness of the system and the water in it. The regularity of this will depend upon manufacturer's recommendations and the result of monitoring.

- Information will be provided to staff and residents on Legionella and the best ways of protecting themselves against any risk.
- The Senior Maintenance Officer will assess the measures being taken and to oversee the process to ensure that the Association is complying with legislation and reducing the risks to all staff and visitors to the office.

## **8.0 Information to Staff and Residents**

- 8.1 Staff will receive an Information Sheet on Legionella and the steps they should take to reduce their risk of exposure as part of their induction.
- 8.2 Residents will receive information on Legionella and the steps taken to reduce the risk of exposure within the Association's properties annually in our newsletter and at each change of tenancy.

## **9.0 Complaints**

- 9.1 Anyone who is not satisfied with the service they have received as a result of this policy has a right to complain. Please see the Association's Complaints Policy for details on how to do this.

## **10.0 Review and Consultation**

- 10.1 This Policy will be reviewed every three years unless amendment is prompted by a change in legislation or monitoring / reporting reveals that a change in policy is required sooner.
- 10.2 Procedures and working methods may be altered more frequently where this is needed.
- 10.3 Policy review will involve consultation with our tenants, our Customer Forum and any other relevant stakeholders. We will take account of any views or representations in revising our policy and service provision.