



Water Hygiene Policy & Procedures

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Vision

By providing aspirational homes and high-quality services we will transform communities to enhance the quality of life of our customers.

Values

- ***Customer and Community Focused***
- ***Treating our customers with respect***
- ***Accountable***
- ***Making a difference***
- ***Innovative***
- ***Equal access to services and opportunities for all***

Strategic Objectives

- ***Deliver first class customer services***
- ***Provide quality homes, communities and sustainable tenancies***
- ***Achieve robust financial management and governance excellence***
- ***Empower, develop and engage our staff***
- ***Build strong collaborative relationships locally and nationally***

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1. Purpose

- 1.1 The aim of this Policy is to ensure the effective inspection, maintenance and management of all water systems within premises controlled by the Organisation.
- 1.2 The procedures detailed within this section have been written to ensure all reasonable steps have been taken to comply with The Control of Substances Hazardous to Health Regulations 2002 (as amended), The Water Supply (Water Fittings) (Scotland) Byelaws 2014 and all other relevant legislation.

2. Definitions

Legionella – “a potentially dangerous type of bacteria when inhaled with water vapour. Bacterium grows best in warm, nutrient rich water.”

Legionella Risk Assessment – “a specific risk assessment carried out to determine the risk level of Legionella Assessment proliferation, and exposure from a specific water system.”

Log Book – “a record book provided to record all local checks and tests carried out, as specified by legionella risk assessment.”

Legionnaires’ disease – “a potentially fatal form of pneumonia caused by the legionella bacteria.”

3. References

- Health & Safety at Work Act 1974
- L8 – The Control of Legionella Bacteria in Water Systems – Approved Code of Practice and Guidance (ACOP) (4th Edition)
- British Standards 8580:2010 – Water Quality: Risk Assessment for Legionella
- HSG Health and Safety in Residential Care Homes (2001)
- HSG274 Legionnaires Disease – Technical Guidance (in 3 Parts) (2013)
- IACL27 (rev2) Legionnaires Disease – A guide to Employers
- INDG 458 Legionnaires Disease – A brief Guide for Duty Holders (2012)
- Public Health etc. (Scotland) Act 2008
- The Building (Scotland) Regulations 2004
- The Control of Substances Hazardous to Health Regulations 2002, as amended
- The Housing (Scotland) Act 2006
- The Management of Health and Safety at Work Regulations 1999
- The Private Water Supply (Scotland) 2006
- The Water Supply (Water Fittings) (Scotland) Byelaws 2014
- The Water Supply (Water Quality) (Scotland) Regulations 2001

4. Legal Duties

- 4.1 The Organisation has several specific legal duties which relate to water safety and, in particular, Legionella risk management. These include:
 - Identifying and assessing sources of risk;
 - Preparing a scheme for preventing or controlling the risk;
 - Implementing and managing the scheme;

- Keeping records and checking what has been done is effective.

5. Legionella Information

- 5.1 Legionella bacteria is common in natural water (such as rivers and ponds). However, legionella can grow in other water systems such as cooling towers, evaporative condensers, showers, spray apparatus and hot and cold water systems.
- 5.2 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 the similar but less serious conditions of Pontiac Fever and Lochgoilhead Fever. 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.
- 5.3 Legionnaires' disease has the potential to affect anybody. 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.
- 5.4 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).

6. Legionella Policy

- 6.1 The Organisation will aim to minimise and control the risk from Legionnaires' disease and, to this end, will use a written control scheme to:
- 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 are present that may encourage Legionella bacteria to multiply or where there is a means of creating and disseminating breathable droplets), and establish any items of non-compliance;
 - Assess the level of risk through an initial desktop Legionella Risk Assessment and which aims to eliminate or reduce the risk to an acceptable level. This will be based on risk situations identified within the L8 (ACOP) document and detailed in the Risk Assessment Matrix in Appendix 1.
 - Arrange for routine inspection and maintenance of water systems, and where needed, a programme of disinfection.
 - Retain records of maintenance, inspection and testing for a minimum of five years.

7. Risk Assessment

- 7.1 The Organisation will arrange for a suitable and sufficient Desktop Risk Assessment to be carried out (and regularly reviewed) to identify and assess the risk of exposure to Legionella bacteria from all water systems across its property portfolio.

- 7.2 The Organisation will use a competent external company with qualified Legionella Risk Assessors to carry out any site-specific Risk Assessments that have been identified as being required by the Desktop Risk Assessment.
- 7.3 All recommendations and remedial action will be recorded in a log book. The recommendations should also highlight the management control actions that may be carried out in-house and those which would require an external contractor.
- 7.4 The Desktop Risk Assessment will be reviewed every 5 years) or when it is believed that the original risk assessment is no longer valid (e.g. following a change in the building or water supply, or following an incident).

8. Water Fittings and System Requirements

- 8.1 The Organisation will ensure that all water fittings comply with relevant legislation and have the CE mark, British Standard kitemark or appropriate equivalent. Specialist advice will be obtained in the selection of all water systems fixtures and fittings.
- 8.2 The Organisation will ensure that all water fittings are suitable for the purpose intended.
- 8.3 Hot water shall be stored in tanks at a temperature of at least 60°C.
- 8.4 Water pipes shall be as short and direct as possible and pipes and tanks will be effectively insulated. Tanks will be protected against contamination and materials used which do not encourage Legionella growth.
- 8.5 Hot water shall reach taps at temperatures greater than 50°C within one minute of running.
- 8.6 Cold water shall be stored at a temperature of less than 20°C. Cold water shall reach taps at temperatures less than 20°C within two minutes of running.
- 8.7 All little used outlets shall be routinely flushed through.
- 8.8 Where water is used or stored for consumption in any devices, e.g. water coolers, tea urns, drinks machines etc., an effective system of regular cleaning and disinfecting shall be introduced, in accordance with manufacturer's instructions.
- 8.9 All flexi-hoses used to be WRAS approved
- 8.10 We will use temperature testing at outlets and boiler to determine the effectiveness of thermostatic mixer valves. Where certain tenants are identified as having a scold risk we will service TMVs on a periodic basis in accordance with the manufacturers guidance.

9. Disinfection

- 9.1 Water services will be disinfected when any of the following situations occur:
- If a routine inspection or site-specific risk assessment shows it necessary to do so;

- After any prolonged shutdown of a month or longer (a site-specific risk assessment may indicate the need for cleaning after a period of less than one month, especially in summer where temperatures have been high);
- If the system or part of it has been substantially altered or entered for maintenance purposes in a manner that may lead to contamination;
- Following an outbreak or suspected outbreak of Legionnaires' disease or any other water borne infection/disease.

10. Void Property Actions

- 10.1 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.
- 10.2 To mitigate the increased potential risk associated with voids, the contractor appointed to carry out repair and re-decoration works on all standard properties will carry out and record the following:
- Thoroughly flush all taps.
 - Clean and disinfect all water outlets and shower heads or alternatively replace all shower heads.
 - Inspect and report on water storage tank, where present.
- 10.3 All Special Lets becoming void will be assessed individually and on their own merits.
- 10.4 All tenants will receive a pack at handover confirming that water hygiene measures have been carried out and providing advice on good water hygiene practice during the tenancy.

11. Contractors

- 11.1 A competent external contractor will be appointed to carry out legionella preventative monitoring and water hygiene services. As a minimum requirement, contractors are required to be a registered member of the Legionella Control Association (LCA) or the Water Management Society (WMSoc). Contracted works may include legionella sampling, tank inspections, water sampling, (for all bacteria) and other associated services, as identified in the Legionella Risk Assessment programme.

12. Responsibilities

- 12.1 The Director of Asset Management is the statutory duty holder and is responsible for ensuring that the legionella risk is controlled within AHAs properties. They shall ensure adequate resources are available for the formulation, monitoring and recording of appropriate procedures to comply with the ACOP.
- 12.2 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 the implementation of legionella management procedures.

- 12.3 The Senior Asset Officer 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 AHA 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

13. Notification Requirements

- 13.1 If it is suspected or confirmed that a tenant, employee or visitor has contracted Legionnaires' disease, the Organisation will report the incident to the HSE under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).

14. Tenant Responsibilities

- 14.1 Tenants will be provided with information on good water management and Legionella control through tenancy agreements and/or by means of information leaflets.
- 14.2 Tenants are advised to clean shower heads, descale and disinfect them at least every three months.
- 14.3 For showers that are only occasionally used, tenants are advised to flush the shower through by running the water for at least two minutes once a week.
- 14.4 Where a property is left vacant for any time (e.g. when on holiday), tenants are advised to flush both hot and cold water systems by running all outlets for at least two minutes.
- 14.5 Tenants should inform the Organisation immediately if there are problems, debris or discolouration in the water or are experiencing low hot water temperatures below 50°C.

15. Review

- 15.1 The Organisation will review its methodology for managing Legionella every three years or sooner if required by Statutory or best practice requirements.

Appendix 1 – Desktop Risk Assessment Matrix

Risk	Situation	Control Measures
Higher	Sheltered housing or care homes. Owned office properties with staff. Cold water storage tanks and Indirect hot water systems	Carry out site specific Risk Assessment and carry out recommendations and control measures highlighted.
Medium	Leased properties were water hygiene responsibility of landlord.	Carry out site specific Risk Assessment and carry out recommendations and control measures highlighted.
Low	General needs domestic properties without water in storage tanks and using instantaneous hot water heaters. Leased properties were water hygiene responsibility of occupier.	Periodically publish good water hygiene measures and include as part of handover pack. No site-specific Risk Assessments required unless issue with discoloration or taste of water. Check list by Asset Officer at void inspection to validate desktop risk assessment.