



POLICY: LEGIONELLA – MANAGEMENT AND CONTROL

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Copies of this Policy may be made available in alternative formats on request.

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POLICY: LEGIONELLA – MANAGEMENT AND CONTROL

All reference to 'we', 'our' or 'us' in this Policy should be read as meaning Sandbourne Housing Association.

1. Purpose and aim of the Policy.

- 1.1 This Policy has been developed to ensure that Sandbourne fully complies with the requirements of The Health and Safety Executive's Approved Code of Practice and Guidance L8 "The control of legionella bacteria in water systems" (Fourth Edition).
- 1.2 Sandbourne is responsible for the safe delivery of domestic hot and cold-water supplies to the homes that it owns and manages. The Legionella bacterium can pose significant health risks under certain circumstances to particular 'at-risk' groups such as those over 50, smokers and heavy drinkers, people with diabetes, chronic respiratory, heart, liver or kidney disease, or whose immune system is impaired.
- 1.3 Therefore, a preventative maintenance schedule has been adopted with the specific aim of reducing risks associated with exposure to Legionella Bacterium transmitted from water used for domestic purposes.

2. Introduction

- 2.1 This Policy provides comprehensive guidance in relation to the management and control of Legionella in all Sandbourne homes and properties.
- 2.2 Legionella are bacteria that are common and can be found in environmental water sources such as lakes and rivers as well as cold and hot water systems (i.e. storage tanks, taps, showers, ventilation systems and pipe work etc.). Although Legionella presence is usually associated with large systems such as those in hospitals, schools, offices and factories, it can also be found in smaller systems used in homes and in other residential accommodation.
- 2.3 Legionella disease is a potentially fatal pneumonia caused by Legionella bacteria. It is normally contracted by inhaling viable Legionella bacteria in sufficient quantity, either in tiny droplets of water (aerosols, shower heads, taps fitted with spray nozzles) or in droplet nuclei (the particles left after the water has evaporated) from water contaminated with Legionella, deep into the lungs.

2.4 Legionella's behaviour at water temperature is:

- Between 0°C - 20°C Legionella will remain dormant;
- Between 20°C - 45°C Legionella will multiply;
- Between 46°C - 70°C Legionella will not multiply and will die in time; and
- Above 70°C – no viable Legionella.

2.5 It also requires a source of nutrients to sustain the organism e.g. sludge, scale, rust, algae and other organic matter.

3. Legal requirements

3.1 Under general Health and Safety Legislation, as a landlord (and/or person in control of premises/responsible person) and an employer Sandbourne must:

- Identify and assess source of risk;
- Develop a course of action for preventing and controlling the risk;
- Implement and manage any identified courses of action by appointing a person(s) to have management responsibility (also known as the 'responsible person');
- Keep records and check the effectiveness of past actions completed;
- As it is impractical to risk assess every individual property a representative proportion of the premises will be initially assessed, on the basis of similar design, size, age and water supply; and
- Random sampling will also be undertaken to ensure the risk profile is managed.

4. Roles and responsibilities

4.1 Sandbourne is considered to be a duty holder under the Approved Code of Practice (ACOP) and Guidance (L8) and the Chief Executive is responsible for undertaking or delegating the duties under this Guidance.

4.2 This role is delegated in accordance with the guidance as below:

4.3 As 'Duty Holder' the Chief Executive is responsible, so far as is reasonably practicable, for ensuring the health, safety and welfare at work of all employees in their respective teams. In particular, where the Chief Executive is responsible for staff who may be required to deal with Legionella and will:

- Ensure that adequate resources are made available to enable suitable arrangements for the management of Legionella;

- Ensure appropriate training, information and instruction is provided for relevant staff in the form of training courses, seminars, information leaflets and booklets, and personal instruction as appropriate;
- Ensure that where specialist technical expertise in relation to Legionella is not available within the organisation, suitable arrangements are in place to obtain any necessary information as required.

4.4 The Head of Housing has delegated authority from the Chief Executive to implement and monitor the preventative maintenance schedule to be satisfied that in homes where there is an identified risk of infection from Legionella this is managed and minimised as far as possible. This will be by means of:

- Appointing a Responsible Person or Persons (external consultants) who has/have “sufficient authority, competence and knowledge of the installation(s) to ensure that operational procedures are carried out effectively and in a timely way”;
- A risk assessment being undertaken by the Responsible Person to ensure that suitable procedures are implemented for the management of Legionella;
- Liaison with external consultants to ensure that suitable management arrangements are in place for the monitoring of Sandbourne homes; and
- Liaison with the Maintenance Managers to identify voids that require assessment and monitoring of the programme of preventative maintenance to ensure that this is delivered on an on-going basis.

4.5 All employees are expected to comply with the Management and Control of Legionella Policy.

5. Managing the risk

5.1 Sandbourne has appointed Responsible Persons to manage all of our operational areas relating to Legionella.

5.2 The Responsible Persons will ensure that the water treatment to Sandbourne buildings is carried out to a required standard, where work is carried out by another contractor or other third party.

5.3 As-fitted drawings or a schematic diagram showing the configuration of services will be produced as well as a description of the water system indicating the normal operating parameters, maintenance schedules and actions to be taken should abnormal situations occur. Where there is a risk, the significant findings will be recorded and the relevant staff will be informed accordingly.

5.4 Action identified to control the risk will be monitored at suitable intervals to ensure effectiveness. These will be reviewed at least every two years or

more frequently if changes to the system are made or risks change. A detailed list of considerations is contained in part 12 of the ACOP and Guidance (L8).

- 5.5 All water systems require a risk assessment but not all systems require elaborate control measures. A simple risk assessment may show that there are no real risks from legionella but, if there are, appropriate measures will be implemented to control these risks. The law requires simple, proportionate and practical actions to be taken, including identifying and assessing sources of risk, managing the risk, preventing or controlling the risk; and periodically checking that any control measures are effective.
- 5.6 For most residential settings, the risk assessment may show the risks are low, in which case no further action may be necessary, eg properties with small domestic-type water systems where water turnover is high. If the assessment shows the risks are insignificant and are being properly managed to comply with the law, no further action may be required, but it is important to review the assessment periodically in case anything changes in the system.
- 5.7 Residents will be advised, as part of an ongoing communication, if the hot water is not heating properly or if there are any other problems with the system that this is reported to us, so that appropriate action can be taken and that they should regularly clean and disinfect showerheads within their properties.

6. Record keeping

- 6.1 All Records should be kept for a minimum of five years.
- 6.2 In order to provide an audit trail and comply with the law, the records should include:
 - Details of risk assessment carried out;
 - The written scheme or course of action;
 - The names and responsibilities of the responsible persons under the scheme;
 - Details of any installations;
 - Details of any precautionary measures which have been carried out;
 - Monitoring details (ie reports); and
 - The signature of the person(s) carrying out various tasks or other forms of authentication.

7. Training

7.1 All Sandbourne staff involved with Legionella will receive Legionella Awareness Training.

7.2 This will be revisited on an annual basis.

8. Response to an outbreak

8.1 In the event of an outbreak of Legionella, the “Responsible Person” will follow the emergency and/or contingency plan that should include:

- Identification of the people who may have been exposed;
- Involvement of Public Health Authorities;
- Notifying the Chief Executive; and
- Notifying the Health and Safety Executive.

9. Policy review

9.1 The Policy will be reviewed every three years or more frequently where there has been a change in legislation, or if arrangements within the plan are no longer considered to be adequate, in order to assess:

- Effectiveness of the management plan;
- Overall progress made against the action plan;
- Suitability and maintenance of communications, instruction, training of personnel, employees and contractors;
- Suitability and success of monitoring mechanisms;
- Any updates as a result of legislation changes or incidents; and
- Records of the review will be kept.

10. Equality impact assessment/Protected characteristics (as at 21 March 2023 or later amendments/additions)

10.1. Neutral.

11. Consultation arrangements

1. We will consult all residents and recognised residents’ bodies on any substantive changes to this Policy and their views will be taken into account by the Board before approving it. Our staff will also be consulted on any substantive changes to this Policy and any reasonable suggestions will be taken into account before the Policy is approved by the Board.

Planned Preventative Maintenance Schedule

Item	By Whom	Action	Frequency	Implemented
1.	Maintenance Managers	A visual check of all hot and cold-water supply pipes for dead legs and eliminate within void works.	As required	From March 2021
2.	Maintenance Managers	VOIDS exceeding four weeks – drain down tanks and distribution systems, de-sludge, flush through with fresh water and weak chlorine mix if required.	As required	From March 2021
3.	Maintenance Managers	Ensure that all shower heads and hoses are replaced in void properties prior to re-let.	As required	From March 2021
4.	Head of Housing and Administrator	Remind residents of their responsibilities for cleaning shower heads periodically and flushing through water systems when these have not been used for 14 days or more.	Annually	From February 2021
5.	Maintenance Managers	At all 60+ developments ensure that suitable sample risk assessment have been undertaken and identified actions completed.	Bi-Annually	In place and on-going
6.	Maintenance Managers	At all 60+ sites ensure that annual unvented cylinder checks of communal systems include flushing and cleaning.	Annual	From February 2021
7.	Maintenance Managers	Water temperature checks are undertaken for all sentinel taps and calorifiers at 60+ developments.	Monthly	In place and on-going
8.	Maintenance Managers	Note that all properties with either gas heating or an unvented cylinder have been risk assessed.	Annual	From December 2021
9.	Head of Housing/ Maintenance Managers	Devise and implement a programme to ensure that all remaining homes have a legionella risk assessment in place.		Completed March 2023