

Legionella Policy and Procedures

<i>Purpose:</i>	To establish DPHA's policy and set out our position on the Legionella.
<i>Review Date:</i>	July 2024
<i>Guidance:</i>	The Health and Safety Executive (HSE) Approved Code of Practice (ACOP) Health and Safety at Work Act 1974, The Control of Substances Hazardous to Health (COSHH) Regulations 2002 Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR)
<i>Regulatory Standards:</i>	<ol style="list-style-type: none"> 1. The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users. 2. The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users and stakeholders. And its primary focus is the sustainable achievement of these priorities. 3. The RSL manages its resources to ensure its financial well-being and economic effectiveness. 4. The governing body bases its decisions on good quality information and advice and identifies and mitigates risks to the organisation's purpose.
<i>Date reviewed by Policy Review Working Group (PRWG):</i>	28 July 2021
<i>Date approved by the Board (or PRWG if delegated):</i>	28 July 2021
<i>Publish on the Website:</i>	Yes

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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 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 Water temperatures in the range of 20 – 45oC favour the growth of legionella in water systems. At temperatures below 20oC the bacteria will lie dormant until more favourable conditions occur, at which point they begin to multiply. It will not survive above 60oC therefore to kill the bacteria the water must be heated above 60oC. In addition to temperature control, other methods of protection include ionisation, UV light, chlorine dioxide, ozone treatment or thermal disinfection.
- 1.6 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.
- 1.7 This policy is supplemented by detailed working procedures which will be used by staff in implementing the policy.
- 1.8 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 the Board, 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, customers and for the maintenance of its properties and as such must undertake the following:
- Identify and assess sources of risk
 - Prepare a 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 WATER TANK MITIGATION CONTRACT

- 5.1 The Association will procure a suitable contractor to deliver the testing regime set out in this policy and accompanying risk assessments.
- 5.2 A list of addresses of common closes with water tanks still present is attached at **Appendix 1**.

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 2 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 is associated with the system.

7.0 MONITORING AND CONTROLLING THE RISK

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

- 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 the contractor's recommendations.
- Information will be provided to staff and residents on Legionella and the best ways of protecting themselves against any risk.
- An appropriate consultant will be appointed to assess the measures being taken and to oversee the process to ensure that the Association are complying with legislation and reducing the risks to all staff and visitors to the office.
- Disconnecting or removal of water tanks when applicable.

7.2 A full list of procedures and action is attached at **Appendix 2**.

8.0 RESPONSIBILITIES

8.1 **Appendix 3** lists the Association's Legionella management plan, key contacts and nominated authorities.

8.2 For clarification the specific operational role / responsibility of the Customer Service Team Leader includes:

- To appraise any guidance or changes in regulation and ensure that the Association's 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 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 Association's office inspection procedure.

9.0 INFORMATION TO STAFF AND RESIDENTS

- 9.1 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.
- 9.2 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.

10.0 EQUALITY AND DIVERSITY

- 10.1 We are committed to promoting an environment of respect, understanding, encouraging diversity and eliminating discrimination by providing equality of opportunity for all. This is reflected in our Equality and Diversity Policy.

11.0 COMPLAINTS

- 11.1 Although we are committed to providing high levels of service, we accept that there may be occasions where you may not be satisfied with the service you have received from us. We value all complaints and use this information to help us improve our services. Our Complaints Policy describes our complaints procedure and how to make a complaint.

12.0 GDPR

- 12.1 We will treat your personal data in line with our obligations under the current data protection regulations and our Privacy Policy. Information regarding how all data will be used and the basis for processing all data is provided in our Customer Fair Processing Notice.

Appendix 1

LIST OF COMMON CLOSURES WITH A WATER TANK STILL PRESENT (at July 2021)

6 Agamemnon Street
12 Agamemnon Street
6 Burns Street
9 Burns Street
11 Burns Street
12 Burns Street
18 Burns Street
19 Burns Street
20 Burns Street
23 Burns Street
340 Dumbarton Road
346 Dumbarton Road
404 Dumbarton Road
427 Dumbarton Road
433 Dumbarton Road
441 Dumbarton Road
449 Dumbarton Road
457 Dumbarton Road
465 Dumbarton Road
561 Dumbarton Road
569 Dumbarton Road
577 Dumbarton Road
599 Dumbarton Road
609 Dumbarton Road
824 Dumbarton Road
830 Dumbarton Road
11 Dunn Street
13 Dunn Street
17 Dunn Street
19 Dunn street
21 Dunn street
5 Caledonia Street
11 Caledonia Street
4 The Crescent
6 The Crescent
8 The Crescent
16 The Crescent
696 Dumbarton Road
800 Dumbarton Road
804 Dumbarton Road
9 Pattison Street
8 Scott Street

12 Scott Street
14 Scott Street
16 Scott Street
18 Scott Street
20 Scott Street
22 Scott Street
3 Shaftesbury Street
5 Shaftesbury Street
3 Stewart Street
5 Stewart Street
9 Stewart Street
10 Stewart Street
11 Stewart Street
12 Stewart Street
13 Stewart Street
15 Stewart Street
8 Swindon Street

Appendix 2

PROCEDURES

Risk Assessment

A risk assessment will be carried out by an appointed contractor and any identified risks scored as low medium or high with appropriate mitigation actions planned.

Each year, the Asset Officer will review risk assessments updating any changes in legislation, information etc.

Cold Water Storage Tank Inspections

The Association will employ a contractor to assess the condition of all cold water storage tanks every two years found within the roof space of tenement properties in terms of condition, cleanliness, insulation, temperature, water flow, protective covers etc. until all cold water storage tanks are removed where they are deemed to be redundant.

Introduce a cleansing agent that will restrict the growth of the legionella bacteria in accordance with the contract.

The Asset Officer will ensure that relevant log books record work carried out by the contractor and update a spreadsheet on the computer under Legionella Folder [\\dpha-app-a\Text\PROPERTY & MAINTENANCE\Procurement\Procurement 2018\Legionella](#).

The contractor will check the internal condition of the water storage tank and the water it contains together with the external condition of the tank every two years. Particular attention will be given to:

- The presence of any form of corrosion deposit, silt, scale or microbiological slimes.
- Tank insulation.
- The tank lid and all other means e.g. rodent screens and membrane filters used to prevent debris getting into the tank.
- A dip slide may be taken to get an indication of microbiological contamination in the tank.
- On occasion stratification in calorifiers can lead to legionella and other micro-organisms multiplying in the bottom sludge in a calorifier. It is good practice to drain the sludge out of the calorifier by opening the bottom drain valve and allowing the sludge to run out preferably into a bucket or to a suitable drain.
- Site investigations with the appointed Legionella contractor along with our plumbing contractor, will be carried out to assess the possibility of removing all of the cold water storage tanks and converting the required properties onto mains pressure, removing the requirement of legionella testing to properties that have these tanks.

Showers

- Showers are one of the main sources of contracting Legionella and it is important that these are run and cleaned regularly.

- The Association is unable to take responsibility for every tenant’s shower, but the Housing Officers will provide annually, in our summer newsletter and whenever there is a change of tenancy, information to tenants on the regular cleaning of showers and the dangers related to the exposure to the legionella virus. Void properties with showers will have shower heads replaced and outlets will be flushed for several minutes prior to properties being relet to new tenants.
- A Legionella information leaflet will be issued to all tenants who receive adaptation installations.
- The Property Services Assistant will maintain a log for the office as per the following schedule.

Schedule of Inspections and Cleansing

The following schedule sets out the various tasks to be undertaken, the frequency and the responsible person.

Tenanted Properties

Task	Frequency	Responsible person
Risk assessment update	Every 2 years	Appointed contractor
Risk assessment monitoring	Every 2 years	Property Services Officer
Cold Water Storage testing	Every 2 years	Appointed contractor
Recording Cold Water Storage assessment in Log Book	Every 2 years (after inspection and desludging)	Appointed contractor
Log book monitoring	Every two years	Property Services Officer
Tenants Shower – information provision	Annually via our newsletter and at each change of tenancy	Housing Officers
Void management, shower head renewals & outlets flushed	At each change of tenancy	Housing officer at each viewing to run all water outlets and flush the toilet.
Check and clean all shower heads in Sheltered & care flats	6 Monthly	Appointed Contractor

Non Self-contained units where care is provided by an external organisation

A separate procedure will be developed for tenants who receive extensive care provision from an external organisation. This will be included in the procured legionella contract after consultation with the separate care providers.

Association's Offices

Task	Frequency	Responsible Person
Ensure all outlets are flushed	Monthly	Customer Services Assistant
Hot Water temperature checks Sentinel Outlets to be selected	Monthly	Customer Services Assistant
Cold Water temperature checks	Monthly	Customer Services Assistant
Log Book Maintenance	Monthly	Customer Services Assistant
Log Book Monitoring	Quarterly	Asset Officer

Appendix 3

MANAGEMENT PLAN, KEY CONTACTS & NOMINATED AUTHORITIES

	NAME	ADDRESS	TELEPHONE NO.
Statutory Duty Holder	Dalmuir Park HA Ltd	Beardmore House 631 Dumbarton Road, Dalmuir G81 4EU	0141 952 2447
Nominated Responsible Person	Dougie Wilson	As above	As above
Deputy	Andy Taggart	As above	As above
Deputy Testing operative (office)	Laura Greenlees	As above	As above
Heating Engineer	Hi Flo		
Water Treatment contractor	H2o		
Water Supply Company	Scottish Water		
Nearest A&E Hospital	The Queen Elizabeth University Hospital	1345 Govan Road Glasgow G51 4TF	0141 201 1100