



Craigdale
HOUSING ASSOCIATION

LEGIONELLA MANAGEMENT POLICY

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Craigdale Housing Association can provide this document on request, in different languages and formats, including Braille and audio formats.

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Legionella Management

1. Introduction

- 1.1 The purpose of this Policy is to reduce the risk of Legionella growth in associated water installations owned by Craigdale. Legionella is a potentially dangerous type of bacteria when inhaled with water vapour. Bacterium grows best in warm, nutrient rich water.
- 1.2 Therefore the main objectives of this Policy are to:
- Set out how Craigdale will meet its statutory duties in relation to the management of Legionella.
 - Set out control measures for ensuring safety from infection from Legionella.
 - Demonstrate how we will meet the Scottish Social Housing Charter Standards and Outcomes.

2. Legal and Regulatory Framework

- 2.1 Whilst this Policy sets out to explain Craigdale 's approach to reducing the risk of Legionella growth it must do so in the context of legal and regulatory requirements. Therefore, the following relevant legislation has been considered in the development of this Policy:
- Health & Safety at Work Act etc. 1974
 - Management of Health & Safety at Work Regulations 1999
 - Control of Substances Hazardous to Health Regulations 2002, (as amended)
 - L8 Legionnaires' Disease - The control of Legionella bacteria in water systems, Approved Code of Practice and Guidance (4th Edition)
 - HSG274 Legionnaires' Disease – Technical Guidance (in 3 Parts) (2013)
 - IACL27 (rev2) Legionnaires' Disease – A Guide for Employers
 - INDG458 Legionnaires' Disease – A brief guide for Duty Holders (2012)
 - HSG220 Health & Safety in Residential Care Homes (2001)
 - British Standard 8580:2010 - Water Quality: Risk Assessments for Legionella Control
 - The Private Water Supply (Scotland) 2006
 - The Water Supply (Water Fittings) (Scotland) Byelaws 2014
 - The Water Supply (Water Quality) (Scotland) Regulations 2001

2.2 The Scottish Social Housing Charter

- 2.2.1 The Social Housing Charter came into effect in April 2012, and this sets the standards and outcomes that all social landlords should aim to achieve when performing their housing activities. The Charter replaces the Performance Standards and the outcomes relevant to this Policy are:

1. Equalities

Social Landlords perform all aspects of their housing services so that every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services.

2. Communication

Social landlords manage their businesses so that tenants and other customers find it easy to communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the services it provides.

3. Participation

Social landlords manage their businesses so that tenants and other customers find it easy to participate in and influence their landlord's decisions at a level they feel comfortable with.

4. Quality of Housing

Social landlords manage their businesses so that tenants' homes, as a minimum, meet the Scottish Housing Quality Standard (SHQS) by April 2015 and continue to meet it thereafter, and when they are allocated, are always clean, tidy and in a good state of repair.

5. Repairs, maintenance, and improvements

Social landlords manage their businesses so that tenants' homes are well maintained, with repairs and improvements carried out when required, and tenants are given reasonable choices about when work is done.

13. Value for Money

Social landlords manage all aspects of their businesses so that tenants, owners and other customers receive services that provide continually improving value for the rent and other charges they pay.

2.2.2 Social landlords are responsible for meeting the standards and outcomes set out in the Charter. The Scottish Housing Regulator is responsible for monitoring, assessing, and reporting on how well social landlords, individually and collectively, achieve the outcomes.

2.2.3 In line with the regulatory principles, the Regulator's approach to monitoring landlords' achievement of the outcomes and standards in the Charter will be based on each landlord's performance information and their own assessment of their performance. Therefore, for each year ending on 31st March, we will be expected to:

- Measure and assess our performance in progressing towards or achieving the Charter outcomes and standards
- Provide the Regulator with some key performance information on our achievement of the outcomes and standards
- Report our performance to tenants and other service users who use our services.

2.3 Organisational Values

Our Vision: *"Changing Lives for the Better"*

Our Values:

- *Respect: We will treat people with courtesy, politeness, and kindness: recognising that people have rights, opinions, and experiences.*
- *Openness: we will be transparent and accountable in all our actions and decision making.*

- *Trust: we will be honest, objective, consistent, open and lead by example in everything we do.*
- *Listening: we will listen actively listen to what people tell us and we will remain neutral.*

3. Legionella Overview

- 3.1 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.
- 3.2 Legionnaires' disease is a potentially fatal form of pneumonia caused by the inhalation of Legionella bacteria. 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.
- 3.3 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.
- 3.4 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).

4. Legal Duties

- 4.1 Craigdale 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 Risk Management

- 5.1 Craigdale will aim to minimise and control the risk from Legionnaires' disease and, to this end, will:
- 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 a structured Legionella Risk Assessment programme, and aim to eliminate or reduce the risk to an acceptable level
 - 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.

5.2 Risk Assessment

- 5.2.1 Craigdale will arrange for a suitable risk assessment programme to be carried out (and regularly reviewed) to identify and assess the risk of exposure to Legionella bacteria from all water systems across its properties.

- 5.2.2 Craigdale will use a competent external company with qualified Legionella Risk Assessors to carry out the risk assessment programme. The Assessment company will not normally be associated with a water hygiene/control contracting company to ensure independent recommendations are given by the Assessor. The Assessors and Craigdale will determine an appropriate programme of risk assessing, which may involve the use of 'representative' assessments followed by an ongoing programme or rotation across different addresses.
- 5.2.3 All recommendations and remedial action will be recorded in a logbook. The recommendations should also highlight the management control actions that may be carried out in-house and those which would require an external contractor.
- 5.2.4 The risk assessment will be reviewed at regular intervals (at least every two 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).

6. Water Installations Requirements

- 6.1 Craigdale 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.
- 6.2 Craigdale will ensure that all water fittings are suitable for the purpose intended.
- 6.3 Hot water shall be stored in tanks at a temperature of at least 60C.
- 6.4 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.
- 6.5 Hot water shall reach taps at temperatures greater than 50C within one minute of running.
- 6.6 Cold water shall be stored at a temperature of less than 20C. Cold water shall reach taps at temperatures less than 20C within two minutes of running.
- 6.7 All little used outlets shall be routinely flushed through.
- 6.8 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.

7. Disinfection

- 7.1 Water services will be disinfected when any of the following situations occur:
- If a routine inspection or risk assessment shows it necessary to do so
 - After any prolonged shutdown of a month or longer (a 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 Legionaries' disease or any other water borne infection/disease.

8. Void Properties

- 8.1 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.
- 8.2 To mitigate the increased potential risk associated with voids, the following work will be carried out on all voids and recorded on the void sheet:
- Thoroughly flush all taps
 - Replace all shower heads
 - Inspect and report on water storage tank (where present).

9. Contractors

- 9.1 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.

10. Notification Requirements

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

11. Tenant Responsibilities

- 11.1 Tenants will be provided with information on good water management and Legionella control means of information leaflets, website, and newsletters.
- 11.2 Tenants are advised to clean shower heads, descale, and disinfect them at least every two months.
- 11.3 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.
- 11.4 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.
- 11.5 Tenants should inform the Craigdale immediately if there are problems, debris, or discoloration in the water.

12. Equal Opportunities

12.1 We are committed to ensuring equal opportunities and fair treatment for all people in its work. In implementing this Policy, we will provide a fair and equal service to all people, irrespective of factors such as gender, race, disability, age, sexual orientation, language or social origin, or other personal attributes.

13. Performance Management

13.1 We will monitor performance using the following:

- Our Tenant and Resident Safety Assurance exercise.

14. Tenant Participation

14.1 We are a tenant focussed organisation and as such we are committed to involving tenants in all aspects of our work and ensuring that tenants are included, informed, and consulted about decisions that have an impact on the way their homes are managed.

14.2 As part of this commitment we will involve our tenants in the development of our policies and seek feedback where appropriate. We will ensure that any significant changes to this Policy and other Policies which will affect our tenants will be the subject of consultation.

15. Risk Management

15.1 In all the key areas of our business we need to consider any risks which may arise. To this end we have in place a robust Risk Management Policy and from this flows our Risk Register. We have identified our material risks which are regularly monitored by our Management Team and Audit Sub-Committee.

15.2 Key to the mitigation of the risks associated with Legionella Management is having a comprehensive policy in place to manage the process. This policy sets out Craigdale's approach to the management of the Legionella risk.

15.3 To ensure we continue to manage the associated risks we will periodically review this Policy to ensure compliance with all legislative requirements and regulatory and best practice guidance.

16. Complaints Procedure

16.1 We aim to get things right first time and provide a good quality service to our tenants and other customers. However, we acknowledge that things can go wrong and that some tenants or other customers may be unhappy with the service provided.

16.2 We promote our Complaints procedure through our website and periodic articles in our newsletters. This information leaflet is also issued to all new tenants as part of the signing up pack.

16.3 We are required to report specifically to both our Management Committee and the Scottish Housing Regulator on any complaints concerning equalities issues.

17. Data Protection

- 17.1 On the 25th May 2018 the legislation governing data protection changed with the introduction of the UK General Data Protection Regulation (GDPR).
- 17.2 We hold a variety of Personal Data relating to individuals including tenants, waiting list applicants, factored owners, other service users, employees, and Committee Members. Our Privacy Policy sets out the basis on which we can process and share such data with third parties, it also sets out how we will securely store individuals' data, whether electronically or in paper format. It also provides information on individuals' rights under GDPR including: to view personal data held about them by us; to request a restriction of processing of their data; the right to be forgotten and a right to object to us processing their data. In terms of the rights to be forgotten and to restrict or object to processing of Personal Data, any such requests will require to be considered on their own merits and legal advice will need to be obtained in some circumstances. We have the responsibility for accepting or refusing such requests and will do so in writing.
- 17.3 Under GDPR we are required to provide all customers whose Personal Data we hold with a Fair Processing Notice (also known as a Privacy Notice). The Notice sets out the Personal Data we process and the basis for doing so.
- 17.4 We will only keep and process Personal Data for the original purpose we gathered it for, and we will not keep it for any longer than necessary. Attached to our Privacy Policy is a table of Retention Periods for Personal Data held and processed by us. We recognise that not all Personal Data can be processed and kept for the same period of time, and this will vary depending on the individual circumstances of each person whose Personal Data we hold.
- 17.5 The Privacy Policy sets out what should happen in the event of a Data breach e.g., does the breach require reporting to the Information Commissioner's Office and whether the individual affected should be notified. Timescales are set out for dealing with data breaches.
- 17.6 Full copies of our Privacy Policy are available upon request at our office or from our website www.craigdaleha.co.uk

18. Policy Review

- 18.1 This Policy will be reviewed at least every five years or sooner to ensure it continues to reflect current thinking and practice and to comply with legislative requirements and regulatory guidance.