



Property Management

Legionella Management

Scope:	This policy applies to Circle 33 Housing Trust, EPIC Trust, Mole Valley Housing Association, Old Ford Housing Association, Roddons Housing Association, Russet Homes, South Anglia Housing and Wherry Housing Association
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Signed Off :	Group Policy Forum, 20 th February 2009
Author:	Abi Patience, Policy Officer
Policy Owned by:	Policy and Planning Central Asset Management Team
KLOE:	Stock Investment and Asset Management
QAF (Supported Housing):	C1.3 Security, Health and Safety
Statute:	The Health and Safety at Work etc Act 1974 Workplace (Health and Safety and Welfare) Regulations 1992 The Management of Health and Safety at Work Regulations 1999 The Construction (Design & Management) Regulations 2007 Landlord and Tenant Act 1985 Housing Acts 1985 and 1988
Regulatory Code:	3.2 and 3.4

Legionella Management

1 Scope

1.1 This policy applies to:

- Circle 33 Housing Trust
- EPIC Trust
- Mole Valley Housing Association
- Old Ford Housing Association
- Roddons Housing Association
- Russet Homes
- South Anglia Housing
- Wherry Housing Association

1.2 Legionella bacteria are found naturally in water sources. They can multiply in domestic water systems given the right conditions of temperature and nutrients. Inhalation or ingestion of Legionella bacteria can cause a potentially fatal form of pneumonia called Legionnaire's disease, as well as other less serious illnesses.

1.3 There are also other contaminants found in water systems that can be a risk to health. Action to mitigate the risks associated with Legionella will also counter the risks associated with other contaminants.

1.4 This policy covers the management and control of Legionella and other contaminants in water systems in our general needs and supported housing properties, including communal areas / facilities.

1.5 The health and safety of employees, consultants and contractors is covered by the group [Health and Safety policy](#).

2 Policy Statement

Legionella

2.1 As owners and managers of property we have a duty of care to ensure that residents and visitors can use the relevant buildings and facilities safely. This extends to ensuring that residents and visitors are safe from risks associated with Legionella bacteria and other contaminants.

2.2 We will comply with our duties for repairs and maintenance as set out in the Landlord and Tenant Act 1985 and the Housing Acts 1985 and 1988. In addition we will comply with:

- Health and Safety legislation, including the Management of Health and Safety at Work regulations 1999 and the Workplace (Health, Safety & Welfare) Regulations 1992 (as amended)
- Control of Substances Hazardous to Health Regulations 2002 (COSHH) and Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR)
- The Water Supply (Water Fittings) Regulations 1999 and the Notification of Cooling Towers and Evaporative Condensers Regulations 1992
- The HSE's Approved Code of Practice and Guidance L8 "Legionnaires' disease: the control of legionella bacteria in water systems"

2.3 We will also require our contractors to abide by relevant legislation and technical guidance, as well as our Contractor Health and Safety procedure.

3 Policy

Legionella bacteria

3.1 Legionella bacteria can multiply in domestic water systems under certain conditions. In particular, water temperatures in the range 20°C to 45°C favour growth (below 20°C bacteria may remain dormant). The bacteria will not survive temperatures above 60°C, and for this reason stored water should be kept at this temperature. The risks of scalding associated with hot water are addressed in the [Scalding and Hot Water policy and procedure](#).

3.2 The bacteria also require a supply of nutrients to multiply such as:

- Algae, amoebae and other bacteria within the water itself
- Sediment, sludge, scale and other material within the water system

3.3 A reasonably foreseeable risk of exposure to Legionella bacteria exists in:

- Water systems incorporating a cooling tower or evaporative condenser
- Hot and cold water systems
- Other plant and systems containing water which are likely to exceed 20°C and which may release a cloud of droplets and/or droplet nuclei (the residue that remains when water has evaporated) during operation or when being maintained

- 3.4 Everyone is potentially susceptible to infection but some people are at higher risk e.g. those over 45 years of age, smokers and heavy drinkers, those suffering from chronic respiratory or kidney disease, and people whose immune system is impaired.
- 3.5 Circle Anglia is committed to minimising the risks associated with legionella bacteria. In accordance with the requirements of the Approved Code of Practice we will:
- Identify and assess the risks
 - Prevent or control the risk where possible
 - Appoint responsible people to manage the risks
 - Keep thorough records
- 3.6 We will act differently according to whether the installation is in an individual property or communal areas / facilities of general needs or supported housing, and whether the water systems in the property include a storage tank or not. The different provisions for each situation are set out in the sections below.
- 3.7 Where relevant we will comply with the Notification of Cooling Towers and Evaporative Condensers Regulations 1992 and notify the Local Authority on the correct proforma of any notifiable devices, including cooling towers and evaporative condensers.
- 3.8 Although ultimate responsibility for ensuring safety from legionellosis rests with the landlord, where we have properties managed by managing agents we may require them as part of the contract to be responsible for risk assessing and implementing the legionella management plan for their properties. Any failures to do so will be treated as a breach of contract. Up to date records must be presented as part of the annual self-certification.
- 3.9 Where we manage properties which are not owned by a group partner we will fully cooperate with the property owner to ensure that all safety requirements are fulfilled, including where this is set out in the management contract. The ultimate responsibility for ensuring safety from legionellosis remains with the property owner.

4 Risk Assessments

- 4.1 Circle Anglia has the following risk assessments on its properties:
- **Supported or sheltered housing properties:** individual risk assessments for each scheme

- **Communal areas / facilities:** individual risk assessments for each area, or, where there is more than one area in one building or scheme, one risk assessment for the building or scheme.
 - **General needs properties:** in general no risk assessments will be carried out
- 4.2 All risk assessments to date have been undertaken by a competent person. Where necessary Providers will instruct a suitably qualified and experienced consultant to carry out further risk assessments to ensure that all relevant stock has been assessed.
- 4.3 Risk assessments will be reviewed regularly (at least every two years), or whenever the situation may have changed. Some providers carry out a full risk assessment annually.
- 4.4 We will keep a record of the significant findings of each risk assessment as well as the results of routine monitoring for a minimum of five years.
- 4.5 The assessments contain direction as to how the risk is to be eliminated, or where this is not possible how the risk is to be managed. We will carry out actions identified in the risk assessment as set out in Prevention and Control below.
- 4.6 Where the risk assessment identifies no reasonably foreseeable risk no further measures are necessary. If the situation should change this position will be re-assessed.

5 Prevention and Control

Removing or reducing the risk

- 5.1 Wherever practicable we will remove the potential source of future contamination including the removal of cold water storage tanks and conversion of blocks to rising mains cold water supplies. Planned improvement programmes will gradually replace storage tank water systems with combination boilers throughout our stock over the next ten years, though some properties will continue to require storage tank systems to meet their needs.
- 5.2 On new developments, refurbishments and when carrying out planned improvements we will design out risks where possible, for example by installing a combination boiler instead of a storage tank system. In larger developments where we install communal systems with an element of

renewable energy we will defer to the manufacturers, suppliers and installers of the equipment to include the appropriate safeguards in their systems.

- 5.3 Where we have re-lets expected to be over 25 days we will drain down the water system (some Providers will flush through the system as part of the void handover instead). Void checks will ensure that the water tank is clean, has a lid and is adequately supported.
- 5.4 When risk assessments identify required works to remove or reduce risks they will be carried out as responsive repairs or as part of a planned improvement programme, as appropriate.

Controlling the risk

- 5.5 Where we cannot remove the risk we will control it as far as possible in line with the Approved Code of Practice by doing the following:
- Ensuring that the release of water spray is properly controlled
 - Avoiding water temperatures and conditions that favour the growth of Legionella and other micro-organisms
 - Ensuring water cannot stagnate anywhere in the system by keeping pipe lengths as short as possible or by removing redundant pipe work
 - Avoiding materials that encourage the growth of Legionella
 - Keeping the system and the water in it clean
- 5.6 Our preferred means of controlling Legionella in all our properties is by storing hot water above 60°C and distributing it at 50°C. In general, contractors carrying out the annual gas check in all properties including general needs are instructed to set the temperature on the boiler to 60°C. Any properties not covered by the annual gas check will be provided for separately. We will mitigate the risks associated with hot water scalding in line with our [Scalding and Hot Water policy](#).
- 5.7 In general needs stock it is impractical for the landlord to carry out the regular weekly and monthly checks required to ensure safety from legionellosis. We will publicise to residents the importance of carrying out such checks through our Water Safety leaflet and other resident communications.
- 5.8 In supported and sheltered housing properties we will implement regular checks and maintenance in line with the Approved Code of Practice to ensure systems are correctly used and maintained through regular documented inspection and cleansing routines. This includes:

- Recording tank temperatures
- De-scaling or replacing of shower heads and taps, and general cleaning of system
- Annual inspection of water services

5.9 These checks will be carried out by a responsible and adequately trained member of staff or by a contractor.

5.10 In some properties where it is considered necessary we will use chemicals such as biocides to either kill Legionella (and other micro-organisms) or limit their ability to grow. Some Providers do not use biocides.

5.11 In general we will not carry out regular water sampling and testing for Legionella. We will only do this where:

- Biocides are used to control Legionella rather than temperature
- Where temperature is not achieved consistently
- Where an outbreak is suspected or identified

Any samples will be taken by an appropriately trained person, and analysed by a UKAS accredited laboratory.

Management of the risk

5.12 Each Provider will appoint a responsible person to ensure that the commitments in this policy are carried out as well as the actions identified in risk assessments.

5.13 Where contractors carry out risk assessments, works or checks on our behalf they will be required to meet our health and safety standards and will be appropriately qualified and accredited.

5.14 All staff responsible for managing contracts relating to legionella management and all appointed responsible persons will receive appropriate externally validated training and refresher training.

5.15 All staff responsible for carrying out ongoing checks of water systems will be equipped to do so. All customer facing staff will receive basic Legionella awareness training.

5.16 A record of all training completed will be kept.

6 Service Standards

- 6.1 We will only appoint competent contractors to carry out work associated with legionella management.
- 6.2 All contractors will adhere to our contractors' Code of Conduct.

7 Monitoring

- 7.1 We will monitor the percentage of properties with a risk assessment, and that the regular tests required by the policy and procedure are carried out.
- 7.2 An external competent organisation will be appointed by the central asset management team to undertake an audit of management processes and the quality of works every two years. The audit will highlight any shortcomings and recommend appropriate measures for Circle Anglia to adopt.
- 7.3 In addition the central asset management team will work with partner providers to ensure compliance with this policy and procedure. Regular reports will be made to the group wide safety audit committee by the Responsible Person.

Contractors

- 7.4 We will monitor our contractors in line with the Contract Management policy and the Contractor Health and Safety procedure.
- 7.5 Quality of works is generally assessed in three ways:
- Assessment of a percentage of works by a suitably experienced and qualified officer at the relevant provider or its nominated consultant
 - Self assessment and quality assurance by the contractor
 - Resident feedback and satisfaction surveys

8 Equality and Diversity

- 8.1 It is essential to recognise that customers of all races, ages, religions, gender, sexual orientation, literacy levels and disability should be treated equally and fairly.
- 8.2 Some people are more vulnerable to risks from legionella than others. Our policy is different according to whether a property is supported or sheltered housing or not.
- 8.3 All customers will have access to this document upon request or from our website www.circleanglia.org/customers

8.4 This document and accompanying leaflet can be translated or provided in alternative formats (e.g. Braille, large print, audio) upon request.

8.5 Equality and Diversity training is mandatory for all staff.

9 Publicising the Policy

9.1 Circle Anglia publicises its policies and procedures on Legionella Management to residents and staff in a number of ways:

- Resident Handbook
- Leaflets
- Resident Newsletter
- Resident Website
- CIRANO
- Policy Briefings and
- Training

Glossary

Term	Definition
Legionella bacteria / legionellosis	Legionella bacteria are found naturally in water sources. Inhalation or ingestion of them can cause various illnesses, collectively called legionellosis, including a potentially fatal form of pneumonia called Legionnaire's disease.
Rising mains	Where cold water is supplied on demand through "rising mains" pipes rather than using a storage tank system.
Combination boilers	A modern form of gas boiler which activates on demand usually within a pressurised system. With this form of boiler there is no need for water storage tanks, hot water cylinders etc.
UKAS	The United Kingdom Accreditation Service is the sole national accreditation body recognised by government to assess, against internationally agreed standards, organisations that provide certification, testing, inspection and calibration services.

Related Documents

Document	Link
Connected Policies:	Health and Safety policy Scalding and Hot Water policy and procedure Contractor Health and Safety procedure
Forms and Letters:	None
Leaflets:	Water Safety Contractor Code of Conduct
Other:	None

Version history

Version no.	1	Date effective:	October 2006
Full / partial review?	n/a		
Brief summary of changes:	n/a		
Staff consultation (teams):	SMPRG		
Resident consultation:	None		
Signed off by:	John Shortt, Group Director of Asset Management		
Author:	Jason Christensen		

Version no.	2	Date effective:	March 2009
Full / partial review?	Full		
Brief summary of changes:	Complete rewrite including update to ACOP recommendations and balance of policy and procedure. Now includes Mole Valley, Roddons and Russet.		
Staff consultation (teams):	Central Asset Management team Circle 33 Neighbourhood and Property teams Development Health and Safety Heads of Continuous Improvement Mole Valley staff via Glynis Gatenby Old Ford Housing and Property teams Roddons Property team Russet staff via Lesley Hardwick South Anglia Neighbourhood and Property teams Support Initiatives Wherry Neighbourhood and Property teams		
Resident consultation:	Mole Valley Operations Working group Mole Valley Policy Forum Russet Residents' Panel		
Signed off by:	Group Policy Forum, 20 th February 2009		
Author:	Abi Patience, Policy Officer		

Version no.	3	Date effective:	
Full / partial review?			
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Resident consultation:			
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