



## **Control of Legionella Policy**

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### **1.0 Introduction**

The aim of this document is to define a policy for the control and management of legionella bacteria in water systems within the dwellings and office buildings owned, managed and under the control of Manningham Housing Association Limited (MHA).

MHA is aware of the requirements under the following legislation and regulations-

- HSAWA the Health and Safety at Work Act (1974)
- MHSWA Management of Health & Safety at Work Regulations (1999)
- COSHH the Control of Substances Hazardous to Health Regulations (2002)
- RIDDOR (Reporting of Injuries & Dangerous Occurrences Regulations (2013)
- Approved Code of Practice (ACoP) The control of legionella bacteria in water systems (2013) and guidance HSG 274 Parts 2 and 3

MHA recognises its responsibility to assess, prevent and control risks associated with legionella bacteria and prevention of legionellosis (including Legionnaires' disease) from work activities and water systems on MHA premises.

### **2.0 Legionella Background**

Legionella which causes Legionnaires disease and other illnesses are naturally widespread in water systems. The number of organisms which cause infection has not been reliably determined, however, some clients are particularly at risk and those who are immuno-compromised can be especially susceptible.

Outbreaks have been linked to the inhalation of infected aerosols. Most people recognise that showers and wet cooling towers generate aerosols. Less well known is that a "fog" of aerosols is generated when a bath or basin is filled.

Aerosols can be generated from any water outlet, and no water outlet can be considered free from potential risk. Hence baths, spa baths, hydrotherapy pools and equipment which generates aerosols also represents hazards. If the water is contaminated, the possibility of the organism being contained in the aerosol increases.

Infection is attributed to inhaling legionella, either in water droplets which are small enough to penetrate deeply into the lung, or in droplet nuclei (the particles left after the water has evaporated.)

They may enter man-made systems or water services, where they can multiply under certain conditions. If there is a means of creating and transmitting water droplets people in the vicinity may be at risk. Most cases and outbreaks of legionellosis have been attributed to water services in buildings, cooling towers and whirlpool spas (hot tubs). Other sources have been identified including humidification systems, industrial coolants and respiratory therapy equipment.

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### **3.0 The principles of this Policy are:**

1. Meet the legal requirements
2. Appoint a suitable consultant to advise
3. Contract with a suitable company to assist
4. Use MHA staff where appropriate to do specified tasks

The principal statutory requirements for the control and management of legionella bacteria is the Health & Safety Commission Approved Code of Practice and Guidance L8. The purpose of the regulation is to manage the risk from legionella to employees, residents, and visitors to MHA premises. It requires duty-holders to:

- Implement a suitable management structure
- Identify and assess the risks of legionella bacteria in water systems
- Devise a scheme for eliminating or controlling the risk
- Manage the risk, selection and training of competent personnel
- Keep up to date records (electronically and logbooks on site)
- Ensures and encourages as appropriate manufacturers, suppliers, installers, and users to address their responsibilities
- Ensure an escalation and reporting procedure is in place in the event of positive legionella detection.

The above requirements will be met by the following actions:

- Allocation of suitable management structure and ensure these parties are adequately trained.
- Undertake risk assessment to all relevant properties and ensure these are renewed at least every two years or in the event of a fundamental change to the property's services or occupancy.
- Inspection of cold-water storage tanks (Six monthly)
- Visual inspection of the hot water storage vessels (calorifiers) and sample water from drain point (Annually)
- Visual checks of temperatures and settings of hot water storage vessels calorifiers (Monthly)
- Temperatures of hot and cold-water outlets at sentinel taps (Monthly)
- Legionella water samples taken (When necessary)
- Cleaning and disinfection of shower heads (Quarterly)
- Flushing of infrequently used outlets (Weekly)
- Checking other outlets on a rotational basis over a 12-month period
- Checking of incoming mains cold water temperatures (Annually).
- Record all maintenance activities in a suitable logbook and review annually.

### **4.0 Water Systems**

All water systems are included that supply, store and distribute water services in any forms. These are within the physical boundaries of MHA or other premises for which MHA are the owners or are responsible e.g. agents commissioned by the owners to carry out the appropriate plant operation and maintenance activities:

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**Legionella Management Team** comprises:

Chief Executive Officer - Lee Bloomfield

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Director of Operations & Deputy Chief Executive – Ulfat Hussain

[ulfat.hussain@manninghamha.co.uk](mailto:ulfat.hussain@manninghamha.co.uk)

Head of Property Services – Tom Finch

[tom.finch@manninghamha.co.uk](mailto:tom.finch@manninghamha.co.uk)

Health & Safety Compliance Officer – Colette Newton

[colette.newton@manninghamha.co.uk](mailto:colette.newton@manninghamha.co.uk)

*Manningham Housing Association will ensure that all personnel allocated responsibilities under the current and future legislation will be adequately trained to ensure a full understanding of all risks.*

### 5.0 Responsibilities

The Director of Operations will act as Duty Holder and has ultimate responsibility for legionella control. The Director of Operations will:

1. Be responsible for ensuring that there are effective arrangements for the control of legionella by suitable methods of the water systems in MHA housing stock.
2. Appoint a responsible person(s) (Head of Property Services and Health & Safety Compliance Officer) who will be competent and be responsible to the Director of Operations.

The Responsible Person(s) (RP) will:

- a. Have delegated authority within MHA to manage and operate these services. The responsible person will have sufficient technical knowledge, qualifications, and experience to enable all services to be managed and operated in accordance with the current legislation.
- b. Follow current legislation and guidance relating to legionella control.
- c. Identify, assess, and regularly review sources of risk including identifying where systems do not comply.
- d. Prepare a (written) scheme of managing the risk by preventing and or controlling the risk including having up to date plans or schematic diagrams of the water systems.
- e. Implement and manage the scheme or monitor and appointed a consultant or third party or landlord.
- f. Monitor the effectiveness of the water hygiene system.
- g. Keep records of action taken and routine monitoring for at least 5 years
- h. Attend regular training sufficient to maintain competencies, keeping up to date with legislation and current guidance.

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Having two responsible persons means that either are able to deputise during absences due to holiday, illness etc.

### **6.0 The Head of Property Services and Health & Safety Compliance Officer will:**

- Ensure that this policy and procedure is fully adhered to within their area of responsibility
- Establish local procedures with advice and guidance to ensure local work instructions reflect best practice and current legislation and guidance related to the prevention and control of Legionella.
- During temporary closure of part or whole of a building make suitable provision for flushing the hot and cold-water systems. Records will be maintained and retained for 5 years. Flushing includes running taps and showers for a suitable period e.g. 1-3-5 minutes and flushing toilet (WC) cisterns
- Ensure that all taps, showers etc. are frequently flushed with running water for a suitable period e.g. 1- 3-5 minutes weekly or preferably twice weekly

### **7.0 Risk Assessment**

A Legionella Risk Assessment shall be carried out to any property containing stored, shared water services and shall take account of the following:

- The potential for aerosol formation.
- Water temperature are conditions right for the bacteria to multiply e.g. is water between 20 degrees and 45 degrees centigrade.
- Frequency of use of all outlets.
- Means of preventing or controlling the risk.
- Are there any infrequently used outlets e.g. – showers, taps.
- A review of the installed pipe work and services and the provision of a representative schematic drawing, detailing major plant items and key isolation valves, strainers etc.
- Are there any employees, residents, visitors, or contractors vulnerable to infection e.g. elderly, those already ill, smokers etc.
- Are there thermostatic mixing valves (TMV) that are set at a favourable outlet temperature for legionella growth and have pipe lengths to outlets over 1 metre
- Condition of installed services - is there debris in the system such as rust sludge or scale that could provide food for legionella growth?

MHA currently have four sites where the above may apply. These are St Mary Magdalene's Close, Anchor Court, Bank House and Orchid House.

MHA will continually review and develop practices in order to comply with all present and future legionella control regulations and guidance within resources available.

Risks from legionella on MHA premises will be clearly identified. Suitable control measures will be used to protect as far as reasonably practical the health, safety and welfare of its staff, clients, visitors, and contractors.

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These risk evaluations will be reviewed and renewed at least every two years or in the event of fundamental changes to services or occupancy to any of its properties.

Water systems will be adequately cleaned, disinfected, and maintained according to its function so as to protect as far as reasonably practical the health and safety and welfare of its staff, visitors and contractors from legionella. This will be in accordance with the requirements of current legislation.

### **8.0 Actions in the event of a Legionella Outbreak**

An outbreak of Legionellosis is defined by the Public Health Laboratory Service (PHLS) as two or more confirmed cases of Legionellosis occurring in the same locality within a six-month period. The normal procedure would be to inform the Health & Safety Compliance Officer.

On identification of an outbreak or source of legionella bacteria the Health & Safety Compliance Officer will inform the Director of Operations or Executive Team at the earliest opportunity.

The Health & Safety Compliance Officer will also inform the water hygiene contractor to arrange for isolation, drain down and disinfections of the water system in question as soon as possible.

All equipment, plant, and services capable of disseminating airborne water droplets should be shut down until any sampling and remedial actions have been carried out. An emergency disinfection must be conducted, and a review of the Risk Assessment should take place.

A legionella outbreak is also reportable under RIDDOR and will therefore be reported to the HSE by the Health & Safety Compliance Officer.

All relevant staff will be informed during any disinfection for suitable safety measures to be implemented covering tenants and all building occupants.

The Health & Safety Compliance Officer will also: -

- Liaise with the appropriate officer from either the Local Authority or the Local HSE who will invoke an Outbreak Committee.
- Comply with all requests for information / actions required to control an outbreak, including shutting down of systems, cleaning or treatment works as required by the Outbreak Committee.
- Ensure the Outbreak Committee receives information to relevant information such as Risk Assessments, temperature logs and staff sickness records (to determine if there are any undiagnosed cases of Legionellosis related illness).

### **9.0 Personal Protective Equipment**

The appropriate Personal Protective Equipment (PPE) e.g. gloves, respiratory (face mask) and eye protection etc. is to be worn. It is the responsibility of the employer to monitor the

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correct and safe working of the protective measures and employees are responsible for following such procedures.

### 10.0 Record Keeping

MHA will maintain adequate records to demonstrate that precautions continue to be done and that information is available for checking. Records shall be kept for five years of what is done in practice.

### 11.0 Consultants and Contractors

Only competent, experienced, and reputable consultants and contractors will be used to advise, do work and monitoring on MHA premises. MHA will seek advice to ensure full compliance with all relevant legislation. Only companies who are members of the Legionella Control Association will be appointed by MHA.

### 12.0 Domestic Properties

MHA view domestic dwellings as minimal risk. There is rarely an occasion when a property is left in situ with no running water. Other mitigating factors such as electric showers and combi boilers, added to the soft water in Bradford reduce this risk further. MHA have created a risk assessment form for domestic properties and will apply it to long standing empty properties where there are system boilers and water tanks present.

### 13.0 Policy review

This policy will be reviewed every three years or sooner following any significant legislative changes.

<b>Policy</b>	Control of Legionella Policy
<b>Ref No.</b>	HS04
<b>Equality Impact Assessment Completed</b>	Yes
<b>Date to be approved by the Committee</b>	Sep 2023
<b>Next Review date</b>	Sep 2026
<b>Lead Officer</b>	Deputy CEO/Director of Operations