

Control of Legionella Policy

November 2018

Consultation Completed:	Date May 2018
Approved by the ALCT	Date 7 th November 2018
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1. Purpose of the Policy

To set out a standard policy for Queens Cross Housing Association in relation to the control of Legionella bacteria in water systems within property owned by the Association.

2. Definition

Legionella is a naturally occurring bacteria and is common within environmental water sources such as rivers, lakes and reservoirs, usually in low numbers. This bacteria can survive under a wide variety of environmental conditions, but growth is more prolific between temperatures of 20°C and 45°C. Due to the fact that the bacteria is common within the environment, it is almost certain that at some time they will enter the majority of manufactured systems, such as water distribution pipe work. In order to reduce the possibility of creating conditions in which the risk of exposure to Legionella bacteria is increased, it is important to control the risk by introducing measures which do not allow the bacteria to breed.

2.1 Background Information

Legionnaire's disease is a potentially fatal form of pneumonia which can affect anybody, but which principally affects those who are susceptible because of age, illness, or have a pre-existing lung condition. Contracting Legionella can be fatal or cause serious illness.

The disease is normally contracted by inhaling deep into the lungs, the Legionella bacteria, either in tiny droplets of water in the form of aerosols, or in droplet nuclei which are particles left after water containing the Legionella bacteria has evaporated. Not everyone who is exposed will develop symptoms of the disease.

The incubation period is between 2 – 10 days.

3. Policy Statement

The Association will take all reasonably practical steps to ensure the risk of Legionella contaminating water systems under its ownership is minimized. However, should a situation arise where Legionella bacteria are detected within these systems, and the potential for an outbreak exists, then the remedial measures outlined in this document will be implemented.

This policy and procedures will apply to all buildings and individuals employed or engaged by Queens Cross Housing Association.

4. Legal and Regulatory Requirements

Queens Cross Housing Association acknowledges and accepts its responsibilities under the Health and Safety at Work act 1974, The Control of Substances Hazardous to Health Regulations 2002, The Management of Health and Safety at Work Regulations 1999 and the practical advice and guidance given in the Approved Code of Practice (L8)

To comply with its legal duties the Association will:

- Identify and assess sources of risk
- Implement a program of regular checks and monitoring of its water systems
- Ensure suitable and sufficient resources are available
- Implement, monitor and manage all control measures identified
- Keep records of all such measures
- Nominate employees and others with responsibility for implementing this policy
- Review this policy at least every two years

5. Procedure

5.1 Risk Assessment and Treatment

Queens Cross Housing Association carries out risk assessments of water systems in order to categorise the level of risk to residents, staff and visitors, from Legionella bacteria in water systems, both in domestic and in the communal parts of sheltered and general needs schemes. These risk assessments will be reviewed every two years or following significant changes of occupancy and/or services installation that could affect the risk rating of the property.

The risk assessment process map is set out in Appendix B

High Risk: This generally applies to hospitals or buildings with cooling towers.

Medium Risk: Communal parts of sheltered housing schemes and hostel accommodation with cold water storage, and hot water supplied via a separate cylinder.

Control Measures

- Review Risk assessments every two years.
- Chlorination to be carried out by a specialist water quality consultants
- Monthly temperature monitoring to be undertaken by individual site managers
- Inspections of stored water tanks every six months to be carried out by a water quality specialist.
- A log to be kept on site for recording results of temperature monitoring and inspections. The log will be validated during each inspection by the specialist water quality consultant

Low Risk: Domestic premises including blocks of flats with self - contained living units. Typically the water systems are of the domestic type with high turnover, i.e. with a cold water gravity-feed tank to a conventional copper storage cylinder or mains water system with a combination boiler.

Control Measures

- Generally these systems will only be dealt with when they become void.
- Renew or sterilize shower heads prior to re occupation
- Drain down and flush stored water systems

It is recognized that the Association has Tenants who are more vulnerable to Legionnaires disease, such as those who are elderly, or are already ill. The Association will provide information on our website to highlight to tenants on the risks of Legionella. A Temperature monitoring process map is shown in Appendix C

5.2 Actions in the event of a positive result for Legionella

The water quality consultant will notify the relevant duty holder at Queens Cross Housing Association as soon as the test results are known. The Duty Holder at Queens Cross will notify the Health & Safety Executive and Glasgow City Council Environmental Health Department, and then, dependent on the magnitude of the results, the following actions should be taken:

	Action Required
Legionella Bacteria More than 100 but Less than 1000 cfu/litre:	Either <ol style="list-style-type: none">1. If only one or two samples are positive, the system Will be re sampled. If a similar count is found, a full Review of the control measures and risk assessment Will be carried out to identify any remedial actions.2. If the majority of samples are positive, the system may be colonized, albeit at a low level, with Legionella. Disinfection of the system will be considered and an immediate review of control measures and risk assessment will be carried out to identify any other remedial measures to be carried out.
More than 1000	<ol style="list-style-type: none">1. The systems will be re sampled and an immediate Review of control measures and risk assessment will Be carried out to identify remedial actions including Possible disinfection of the system

5.3 Action to be taken in the event of a Legionella outbreak

An outbreak is defined by the Public Health Laboratory Services as two or more confirmed cases of Legionellosis occurring in the same locality within a six month period.

In the event of a suspected outbreak within the Association's premises, the following procedure will be followed:

The Association's duty holder will immediately arrange for the premises to be sampled as per the procedure in 5.2 above, and an urgent review of control measures and risk assessment will be carried out to identify any other remedial action required.

6.0 Managing, Monitoring and Review

This policy will be reviewed every two years.

A report will be presented to the Association's Asset Legislation and Compliance Team annually indicating compliance with this policy and procedures document.

6.1 Details of the Association's organizational structure is given in Appendix A, showing the duty holder and Duty holder's with delegated operational responsibility (DwDOR)

7. Equal Opportunities Statement

Queens Cross Housing Association is committed to developing an organisational culture which values people from all sections of the community, and the contribution that all individuals can make to that community.

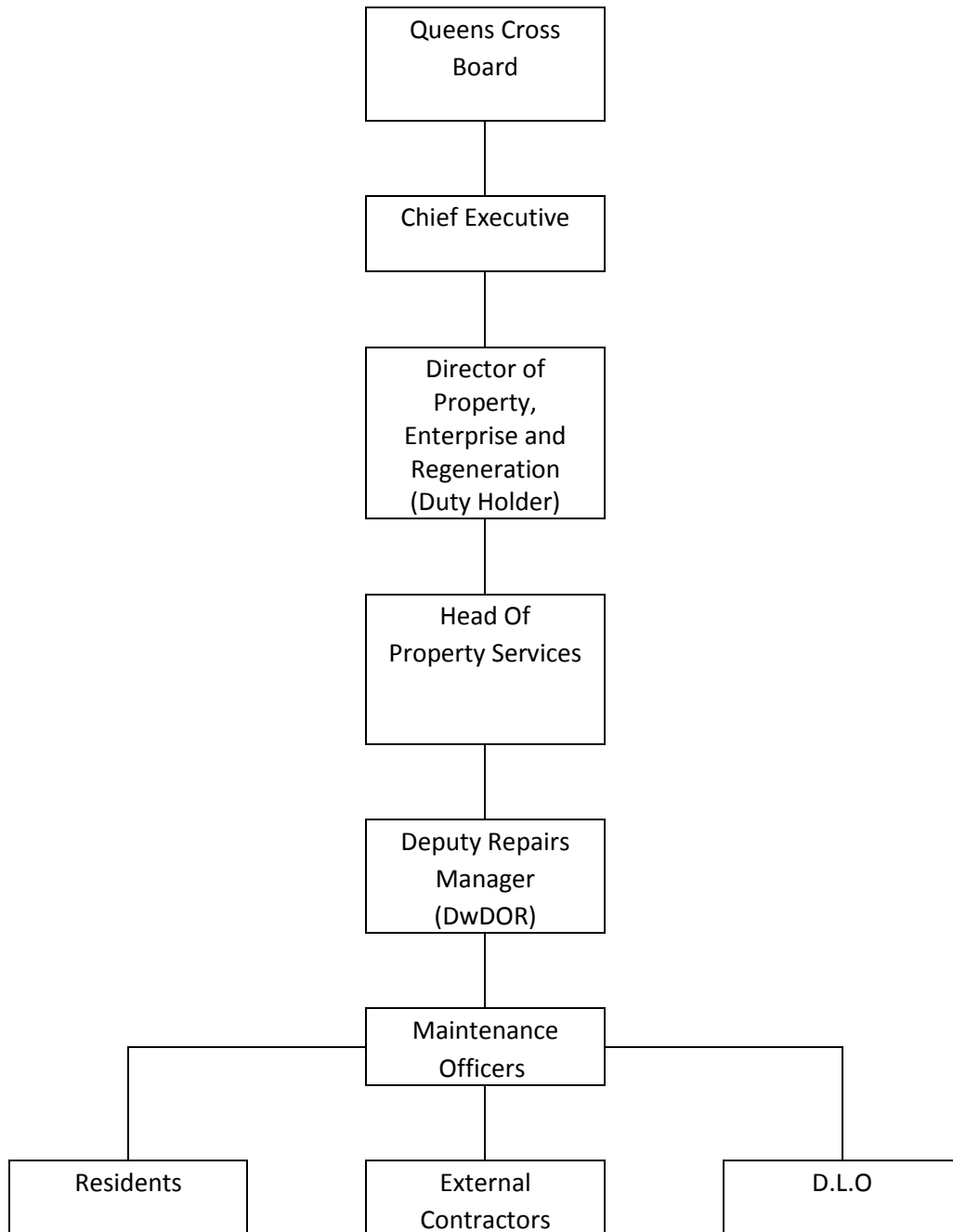
Queens Cross Housing Association will apply this policy in a manner which ensures compliance with the legislation without undermining its overall objective of managing the risk of Legionella within its properties.

The Association will regularly review this policy for equal opportunities implications and take necessary actions to address any policy inequalities that may subsequently arise from the implementation of the policy

An Equalities Impact Assessment is shown in Appendix D

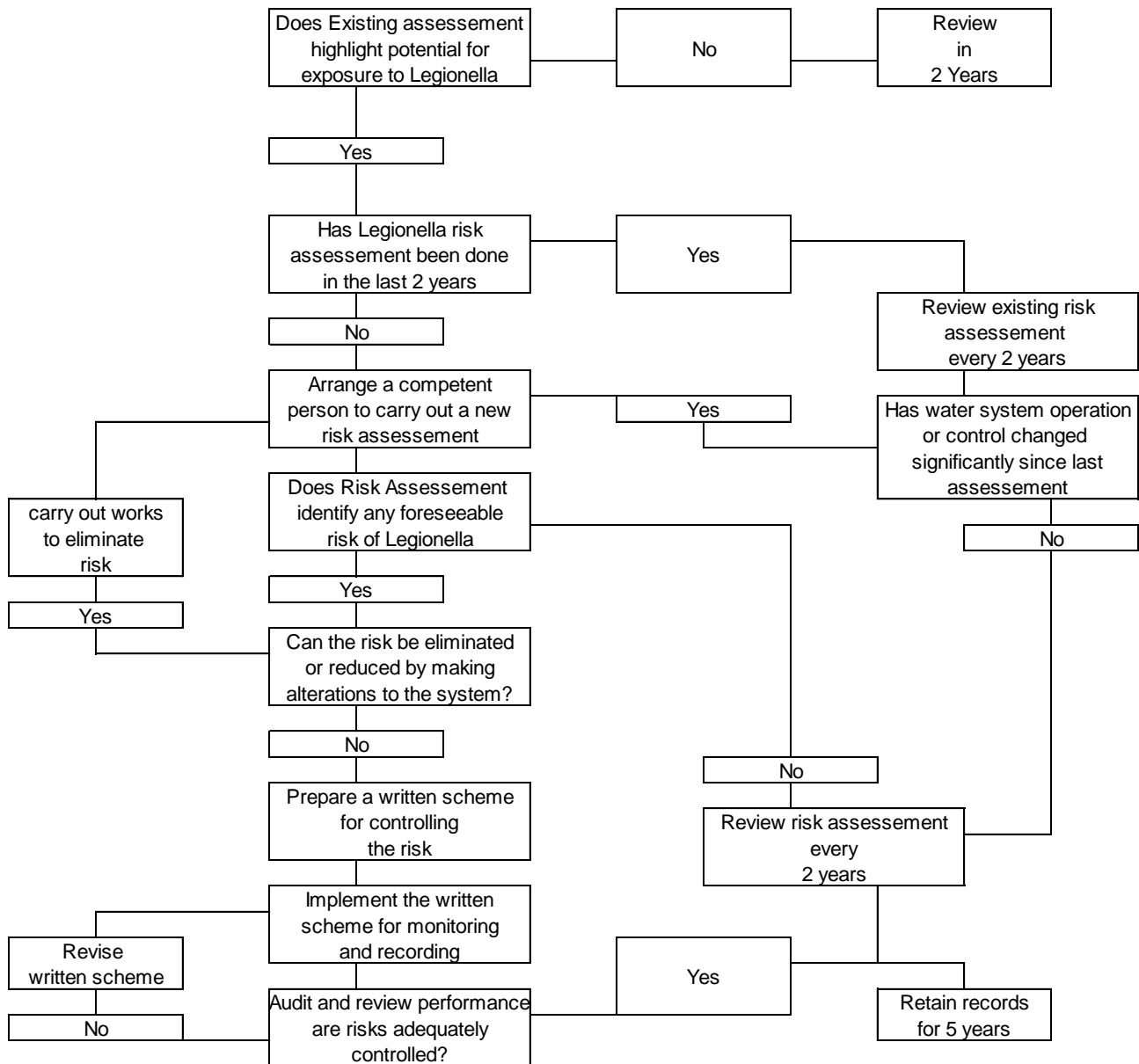
Appendix A

Organisational Structure



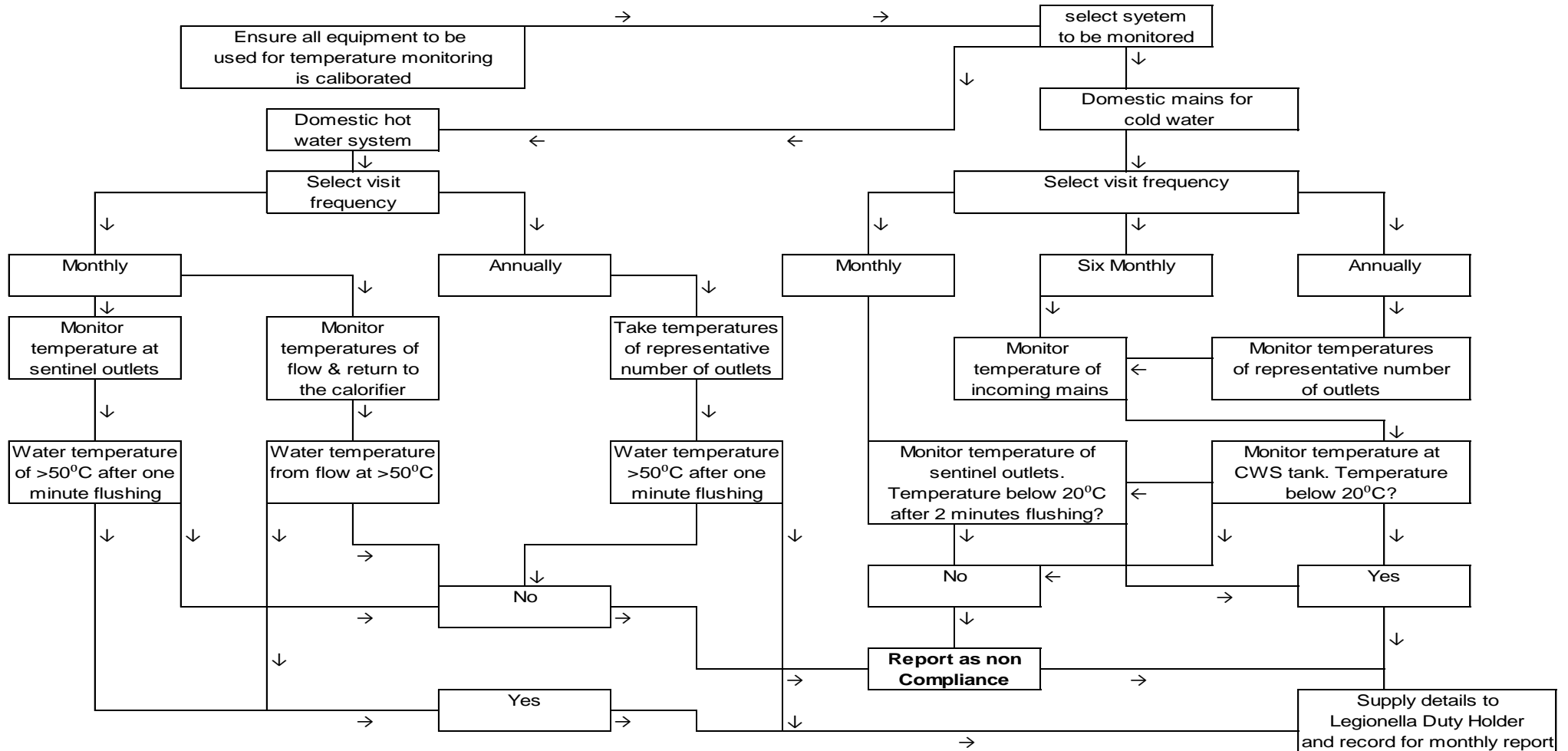
Appendix B

Risk Assessment Process Map



Appendix C

Temperature Monitoring Process Map



Appendix D

Equalities Impact Assessment

Preliminary Equalities Impact Assessment

Department: Technical Services	Completed by (lead): Peter O'Brien	Date of Initial Assessment: 25 January 2018 Reviewed 25 May 2018
Policy to be assessed:	Control of Legionella	
Is this an existing or new policy		Existing
What evidence has been used to inform the assessment and policy?		

Describe the aims, objectives or purposes of the policy and who it is intended to benefit.		To set out a standard policy for Queens Cross Housing association in relation to the control of Legionella bacteria in water systems within property owned by the Association.		
<p>The Public Sector Equality Duty requires QCHA to have due regard to:</p> <p>1. Eliminate unlawful discrimination, harassment and victimisation.</p> <p>2. Advance equality of opportunity between different groups; and</p> <p>3. Foster good relation between different groups</p>		What is the level of impact on each group/protected characteristics in terms of the three aims of the duty?	Identify the risk or positive effect that could result for each of the group/protected characteristics?	If there is a disproportionately negative impact what mitigating factors have been considered?
Protected characteristics	Age	N	Mitigates the risk of our Tenants, staff or other visitors to Queens Cross Housing Association's properties contracting Legionellosis.	
	Disability	N	Mitigates the risk of our Tenants, staff or other visitors to Queens Cross Housing Association's properties contracting Legionellosis.	
	Gender Reassignment	N	Mitigates the risk of our Tenants, staff or other visitors to Queens Cross Housing Association's properties contracting	

			Legionellosis.	
	Marriage & Civil Partnership	N	Mitigates the risk of our Tenants, staff or other visitors to Queens Cross Housing Association's properties contracting Legionellosis.	
	Race	N	Mitigates the risk of our Tenants, staff or other visitors to Queens Cross Housing Association's properties contracting Legionellosis.	
	Religion/Belief	N	Mitigates the risk of our Tenants, staff or other visitors to Queens Cross Housing Association's properties contracting Legionellosis.	
	Pregnancy and maternity	N	Mitigates the risk of our Tenants, staff or other visitors to Queens Cross Housing Association's properties contracting Legionellosis.	
	Sexual orientation	N	Mitigates the risk of our Tenants, staff or other visitors to Queens Cross Housing Association's properties contracting Legionellosis.	
	Sex	N	Mitigates the risk of our Tenants, staff or other visitors to Queens Cross Housing Association's properties contracting Legionellosis.	

Has there been any consultation/engagement with the appropriate protected characteristics?		YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
What action will you take to reduce any disproportionately negative impact, if any?			
Based on the information in sections 2 to 6, should this policy proceed to a detailed impact assessment? (recommended if one or more 'H' under section 2)		YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
Lead Officer signature: <i>P. O'Brien</i>	Approved by:	Date approved:	

Appendix E

Legionella Risk Control Action Plan

Reviewed May 2018

No	Description	Deadline	Current Status	Lead Officer
1.	Clarify Duty Holders and training to ensure that they are aware of their duties, and have suitable competence and training.	September 2018	To be reviewed in light of restructure within Property Services Department	Maintenance Manager
2.	Agree information to be sent out to the most vulnerable Tenants regarding the risks of Legionella	March 2019	Information currently available on our website. Can we make information available to new tenants at sign up? Individual leaflets handed to all tenants receiving retirement service?	Maintenance Manager
3.	Agree general information to be sent out to all Tenants regarding the risks of Legionella	March 2019	Information currently available on our website. Can we make information available to new tenants at sign up? Focus article?	Maintenance Manager
4	Establish a programme of training for Handymen and Supported Housing workers to carry out regular checks for record purposes.	July 2018	Training Complete. Target date updated to arrange further training required for new staff	Maintenance Manager
5	Review Void Management Policy to include Legionella risk control	December 2018	Next review due in 2018	Maintenance Manager