



# **WATER SAFETY AND LEGIONELLA MANAGEMENT POLICY**

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# **WATER SAFETY AND LEGIONELLA MANAGEMENT POLICY**

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# WATER SAFETY AND LEGIONELLA MANAGEMENT POLICY

## I.0 Aims

- I.1 This policy describes the way that Radcliffe Housing Society (“the organisation”) protects the health of residents, employees and members of public from the effects of legionella bacteria in water systems.
- I.2 Legionella bacteria are commonly found in natural rivers and lakes, etc. and artificial water systems, (e.g. hot and cold-water systems storage tanks, pipe work, taps and showers). Large numbers of legionella bacteria are usually associated with larger water systems, but they can also live in smaller water supply systems used in homes and other residential accommodation. Legionella can survive under a wide range of environmental conditions at temperatures up to 70°C although they do not appear to multiply below 20°C - bacteria growth is particularly prevalent in the range of 20 and 45°C. Legionella bacteria also require a supply of nutrients to multiply. In a domestic system, commonly encountered nutrients can take the form of algae, amoeba or other bacteria, sediment, sludge, scale and other similar matter.
- I.3 Legionnaires’ disease is a potentially fatal form of pneumonia caused by the Legionella bacteria and is one of a group of infections known as Legionellosis. There are currently over 50 different known species of Legionella bacteria. Legionnaires’ disease is the only known form of legionellosis that has proved fatal; other diseases caused by the bacteria include Pontiac Fever and Lochgoilhead Fever. There are currently approximately 300 to 350 cases of Legionnaires’ disease in the UK every year, with a mortality rate of between 12% and 14%. Many cases of the disease still go undetected. Infection by legionella bacteria is almost exclusively caused by inhalation deep into the lungs; by breathing in tiny droplets of water (aerosols) or in droplet nuclei (the particles left after the water has evaporated). The incubation period for the bacteria is between 2-10 days (usually 3-5 days) and the symptoms include fever and chills, severe muscle pain, change of mental state (delirium), diarrhoea and dehydration. Legionnaire’s Disease can be treated effectively in most cases with appropriate antibiotics; however, as the symptoms of the disease are very similar to pneumonia, patients are often misdiagnosed resulting in delayed recovery.
- I.4 Legionnaires’ Disease and legionellosis can affect anyone; however certain factors may contribute to the severity of the infection; including:
- Ages above 45;
  - Smokers;
  - Alcoholics;
  - Diabetics;
  - Cancer sufferers;
  - Those with chronic respiratory or kidney disease;
  - Immunosuppressed patients or those with other underlying disease.

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## **2.0 Policy Statement**

2.1 This policy and procedures apply to the housing stock owned and managed by Radcliffe Housing Society. Radcliffe Housing Society is committed to protecting the health, safety and welfare of its residents, employees and members of public, and recognises that 'The Health and Safety at Work Act 1974' extends to the risk from Legionella bacteria that may arise from its water systems and work activities. As well as the Act, there are two specific Regulations and an Approved Code of Practice (ACoP) that apply to the control of Legionella bacteria in water systems. These are:

- The Control of Substances Hazardous to Health Regulations 2002 (COSHH);
- The Management of Health and Safety at Work Regulations 1999 (MHSWR);
- Legionnaires' disease. The control of Legionella bacteria in water systems. Approved Code of Practice and guidance, L8 (4<sup>th</sup> Edition 2014).

2.2 In addition, the following are also to be taken into consideration as certain aspects of these regulations and the practices associated with achieving compliance will ensure the supply, installation and maintenance of safe water systems, and therefore directly benefit any Legionella control programme:

- HSE Legionnaires' Disease Technical Guidance HSG274 Part 2: The Control of Legionella Bacteria in Hot & Cold-Water Systems;
- Department for Communities & Local Government: Housing Health & Safety Rating System;
- Water Supply (Water Fittings) Regulations 1999.
- BS8580:2010 Risk Assessments for Legionella Control – Code of Practice

2.3 A summary of the requirements of the above and more information about Legionella is contained further within this document.

2.4. This policy applies to all Radcliffe Housing Society staff and its Partners, Consultants and Contractors involved with maintenance or the provision of water systems, supervising such work, or issuing contracts for work. All must fully familiarise themselves with the contents of this document and implement the actions detailed within.

2.5. Radcliffe Housing Society's policy is to remove, wherever possible, the risk at source. Only when this is not feasible are control measures implemented.

## **3.0 Applying Legislation**

RHS will ensure:

- Appoint a suitably qualified service provider to provide support with all aspects of legionella control. Service providers must be members of the Legionella Control Association;
- That a regular inspection system is in place and that the Legionella / water management logbook is kept up to date;
- A programme of cleaning and chlorination of Cold-Water Storage Tanks (CWST) is in place.

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*Note 1: The requirements for competence include successful completion of accredited training in legionella awareness and the management of hot and cold-water systems, along with appropriate technical qualifications and experience in the installation, maintenance and management of hot and cold-water systems. Legionella specific training must be refreshed every 3 years as a minimum. A list of accredited training providers can be found on the Legionella Control Association website [www.legionellacontrol.or.uk](http://www.legionellacontrol.or.uk).*

## 4.0 Responsibilities

The following parties are responsible for the successful delivery of this policy:

- CEO – Board are ultimately responsible for Health and Safety through the CEO
- Asset Manager – Overall responsibility for the management of this policy and to ensure full compliance with statutory legislation is followed. They are also responsible for ensuring all staff at RHS are familiar with the signs and symptoms of Legionnaires Disease and Legionellosis, and the importance of the control of the legionella bacteria.

4.1 The contractor appointed to carry out the work on behalf of RHS must be available for practical advice on all aspects associated with this policy, risk assessments and maintenance, testing inspection and sampling water systems.

## 5.0 Procedure in dealing with an outbreak of Legionnaires disease

5.1 If a case of Legionnaires disease is diagnosed or confirmed present in a resident of / visitor to St Andrews House, RHS will investigate to determine the cause. Checks will find out whether the case is part of an outbreak or cluster, home related, part of a hospital acquired infection or is travel associated based on recent movements.

5.2 If external causes are ruled out, RHS will investigate whether the communal water systems has been unused for several days before the onset of illness and refer to the most recent log in the record book. The Asset Manager (will liaise with the Scheme Manager – evacuate/ isolate part of the scheme?) and arrange for the retained contractor to carry out an urgent survey & risk assessment within 24 hours of the first notification.

5.3 If the results confirm the tanks to be the cause off the outbreak the AM will:

- Convene an incident control team meeting (CEO, HM, CSO, AM) to agree an action plan & institute remedial control measures to prevent the further spread of symptoms;
- The Scheme Manager (with medical experts?) will check for respiratory symptoms in other residents;
- Review the contractors report and take any immediate action required; and
- Notify the authorities as required under RIDDOR.

5.4 The Am in Liaising with professional and the CEO will consider:

- Short term evacuation / use of guest room?;
- Reassurance / public relations (CE & press enquiries) / relatives;
- Notify our insurers / record all actions taken?;
- Checks to confirm when & whether safe to return to the property;
- Other low risk / potential sources – shower head cleansing?

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## 6. Risk Assessment

- 6.1 Radcliffe Housing Society recognises that all water systems require risk assessment but due to the different types of property owned and managed, including a high number of single dwellings with small water systems having a high turnover of water, a different approach to risk assessment is required to avoid excessive and unnecessary cost, as follows:
- 6.2 Category A properties will require a full risk assessment in accordance with BS8580:2010 and will be reviewed on a 2-year basis, and include the following:
- Properties with a number of interconnected or adjoining housing units where some or all of the tenants are elderly or otherwise vulnerable persons (sheltered schemes)
  - Properties with a number of interconnected or adjoining housing units where some or all component parts of the water system are shared between tenant dwellings will require a full risk assessment in accordance with BS8580:2010 and will be reviewed on a 2-year basis.
  - Property occupied by Radcliffe Housing Society employees, whether owned, leased to others or leased from others (as determined by the lease contract) including offices and depots.
  - Ponds & fountains
- 6.3 Category B properties will require a sample risk assessment to ensure that the water system is designed and installed to effectively control legionella bacteria and that it complies with the Water Supply (Water Fittings) Regulations 1999. The initial risk assessment will be undertaken for all properties over a 5-year programme and reviewed every 5 years / to coincide with other statutory inspections.
- 6.4 Category C properties will require a sample risk assessment to ensure that the water system is designed and installed to effectively control legionella bacteria and that it complies with the Water Supply (Water Fittings) Regulations 1999. The initial risk assessment will be undertaken for all property types over a 10-year programme and reviewed every 5 years / to coincide with other statutory inspections. Category C properties include properties occupied by a single tenant or tenant family (general needs property). Ensure communal areas are inspected and that attempts will be made to gain access to at least 10% of the units.
- 6.5 Risk assessments for all property types will be treated as living documents and will be reviewed when there is reason to believe they are no longer valid, including:
- Following significant changes to the water system or its use;
  - Following changes to the use of the building/property;
  - In light of new information about risks and control measures;
  - When checks indicate that the applied control measures are no longer effective;
  - A case of legionellosis or Legionnaires' disease is associated with the system.
- 6.6 Risk assessments will be undertaken only by persons with suitable training and appropriate levels of competence as appointed or approved by the Responsible Person.

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*\*Assess all properties which now have sealed combination boiler systems, and therefore no cold-water storage.*

## **7.0 Risks**

7.1 Failure to implement this policy could lead to a case or outbreak of legionellosis or Legionnaires' disease, potential resulting in the death or one or more persons. Additionally, such a tragedy would lead to a significant loss of reputation, increased insurance costs, and possible repercussions such as a Health & Safety related prosecution and conviction for corporate manslaughter should gross negligence be identified.

7.2 Where temperature is used as a control for hot water, temperatures at taps and outlets without temperature control will exceed 50°C. Where persons present in these properties may be at risk of scalding, suitable devices such as a thermostatic mixing valve will be installed to limit the temperature at the outlet to no greater than 46°C.