

# LEGIONELLA MANAGEMENT POLICY

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## 1 INTRODUCTION

- 1.1 Stockport Homes Group (SHG) has a duty and a legal responsibility to ensure that hot and cold water systems within all properties and buildings under its control are maintained in order to prevent or control the risk of Legionella exposure to its employees, contractors and customers. SHG recognises that the delivery of an effective water hygiene management regime in line with Approved Code of Practice L8 – Legionnaires’ disease: The control of Legionella bacteria in water systems (ACOP L8) and HSG274 Part 2 is essential in meeting those responsibilities.
- 1.2 This policy seeks to explain SHGs approach to water hygiene management in order to prevent and control the risk of Legionella exposure.
- 1.3 This policy should be read in conjunction with the Legionella Management Procedure.

## 2 SCOPE

- 2.1 The scope of this policy seeks to explain SHGs approach to managing water systems as required under ACOP L8 and HSG274 Part 2.
- 2.2 This policy applies to all properties and buildings that SHG has a maintenance and repair responsibility for, this includes those:
  - Owned by SHG.
  - Owned by the local authority that SHG have management responsibility for.
  - That SHG are responsible for the maintenance of through a contract or tenancy agreement.
  - Where there is no formal contract but SHG has overall control of the building.
- 2.3 The types of buildings and properties affected are:
  - Domestic properties, both single and multi-occupancy.
  - Blocks of flats with a water system serving multiple properties
  - Temporary Accommodation Hostels
  - Non-domestic premises (e.g. community buildings and offices).
  - Any building classed as a workplace under the Health and Safety at Work Act 1974.

## 3 BACKGROUND

- 3.1 Legionnaires disease is a form of pneumonia which if not diagnosed and treated promptly can lead to organ failure, brain damage and death in some cases. The disease is contracted when airborne droplets of water containing Legionella bacteria are inhaled and penetrate the lungs infecting the alveoli (air sacks).
- 3.2 Anyone can contract Legionnaires disease however there are certain “at risk” groups which are more susceptible, this include those with a weakened immune

system, the elderly, smokers, alcoholics and those with existing respiratory conditions. Statistically men over 50 are more susceptible than women of the same age and children are rarely affected.

- 3.3 Low numbers of Legionella bacteria is commonly found in natural water sources such as rivers and lakes and can make its way into man made water systems. If conditions are favourable the bacteria will multiply increasing the risk of exposure.
- 3.4 Favourable conditions include those where the temperature of the water is within a certain range, there is nutrients in the water for the bacteria to feed off and where water becomes stagnant. The risk of exposure is heightened further where there are water systems that create a spray of water, e.g. showers.
- 3.5 ACOP L8 and HSG274 Part 2 provide guidance on the measures to be undertaken to remove or reduce these favourable conditions and therefore reduce the risk of Legionella exposure.

## 4 OUR OBLIGATIONS

- To appoint a Legionella Duty Holder and a suitably competent and qualified Responsible Person and Deputy Responsible Person.
- To appoint a competent specialist water hygiene contractor.
- To commission appropriate ACOP L8 focused Legionella water risk assessments for all relevant properties within the SHG property portfolio.
- To maintain ACOP L8 compliance through the delivery of an appropriate water hygiene management regime.
- To ensure appropriate and timely corrective action is taken in the event of non-conformity with ACOP L8.
- To ensure emergency procedures are in place to deal with a Legionella outbreak.
- To ensure adequate resources are available to manage water systems in line with ACOP L8 and HSG274 Part 2.
- To have quality assurance and performance management arrangements in place to monitor that SHG is meeting its obligations.

## 5 STATEMENT OF INTENT

- 5.1 SHG will have an appointed Duty Holder, Responsible Person and up to two Deputy Responsible Persons. Further details regarding roles and responsibilities and the competency of the Responsible Person and Deputy Responsible Persons are in sections 7 and 8.
- 5.2 SHG will have two appointed competent specialist water hygiene contractors, selected via a competitive tender process, and they will be a member of the Legionella Control Association (LCA) and hold ISO9001, OHSAS 18001, ISO14001 accreditations. SHG will appoint a Water Hygiene Consultant providing LRAs and auditing functions. The second appointed contractor will be undertaking monthly monitoring and water hygiene activities.

- 5.3 A Legionella water risk assessment will be completed by the water hygiene contractor in all of the following buildings:
- Any blocks with a hot and/or cold-water system serving multiple properties, i.e. a water risk assessment is carried out to the communal water system.
  - Houses of Multiple Occupancy (HMOs)
  - Temporary Accommodation Hostels
  - Community Buildings
  - Any building or area classed as a workplace, e.g. Head Office, Stores, Bio Mass Boiler Houses, Pantries.
- 5.4 The purpose of the Legionella water risk assessment is to identify and assess the risk of exposure to Legionella bacteria from work activities and water systems on the premises and any precautionary measures needed.
- 5.5 Where the risk assessment shows that there is a reasonably foreseeable risk a "Written Scheme" for controlling the risk will be produced for the building by the water hygiene contractor. Items included in the written scheme are shown at Appendix 1.
- 5.6 All Legionella water risk assessments will be reviewed and reissued by the water hygiene contractor every 2 years or sooner if it is believed the content of the assessment may no longer be valid. This may result from:
- Changes in the water system or its use,
  - Changes in the use of the building in which the water system is installed,
  - The availability of new risks or control measures,
  - The results of management regimes indicating that control measures are no longer effective,
  - A case of Legionella is associated with the system.
- 5.7 The current version of ACOP L8 guides Duty Holders towards carrying out a Legionella water risk assessment in single occupancy domestic dwellings, though provides no clear guidance on the percentage that should be completed and within what timeframe. The approach adopted by SHG is:
- Due to the residents being considered a Legionella "at risk" group a Legionella water risk assessment has been completed to all flats within Independent Living Schemes.
  - Legionella water risk assessments have also been carried out on a percentage per archetype basis to properties with electric heating (e.g. storage heaters). The reason being is that they will have some form of stored water.
  - A basic Legionella water risk assessment is also carried out by SHG staff on all void properties.

- 5.8 In addition, the following management regimes are in place for all single occupancy domestic dwellings:
- When a property becomes void all hot and cold-water outlets are flushed by running the taps for 2 minutes on the 1<sup>st</sup> day of the void works. This will also be done at the last day of the void works and once a week should there be a long void period. This is to prevent water stagnation in the pipework while the property is empty.
- 5.9 The Compliance Team will manage the delivery of an ongoing water hygiene management regime to all buildings listed in 5.3. The nature and frequency of which will be in line with HSG274 Part 2 (see Appendix 2) and the Written Scheme for the building. The management regime will be delivered by the water hygiene contractor.
- 5.10 In the event of the water hygiene contractor identifying a non-conformity with ACOP L8 the Responsible or Deputy Responsible Person will be notified. The timeframe within which they are notified and the timeframe for completing remedial actions will depend on the severity of the non-conformity. For non-conformities identified on a Legionella water risk assessment these will be addressed within the timeframe recommended by the risk assessor.
- 5.11 Any suspected cases of Legionella will be reported by a medical practitioner to the Local Authority (i.e. SMBC). If a SHG property or building is suspected to be the source of the infection, then SHG will be required to comply fully with the investigation of the SMBC Proper Officer. At the point of investigation notification SHG will contact their appointed water hygiene contractor for support and guidance on the procedure to follow. In addition, the Head of Compliance will inform the Executive Director of Operations who will then determine if the SHG Emergency Plan needs to be evoked.
- 5.12 The Duty Holder must ensure sufficient budget is available to carry out all necessary Legionella water risk assessments, to deliver the water hygiene management regime and to addresses any non-conformities.
- 5.13 The Compliance Team will have mechanisms in place to monitor the delivery of the water hygiene management regime in line with the frequency outlined in HSG 274 Part 2/the Written Scheme and will also have mechanisms to record and monitor completion of non-conformity remedial actions.
- 5.14 The Compliance Team will meet with the water hygiene contractor on a monthly basis to review and discuss performance.
- 5.15 Performance updates will be provided monthly to the Operations Directorate management team.

## **6 CERTIFICATION**

- 6.1 SHG shall keep appropriate and up to date records and certification relating to the management of Legionella for a period of at least 5 years.

- 6.2 The records that are to be kept shall include (but are not limited to);
- An up to date list of properties and buildings that require a Legionella water risk assessment and management regime, including previous completion dates and next due dates.
  - Legionella water risk assessments
  - Written Schemes
  - Monthly temperature monitoring records
  - Annual TMV servicing records
  - Quarterly shower clean records
  - Clean and Disinfection Certificates
  - Up to date building schematic drawings
  - Records evidencing the review and action of any non-conformities.
  - Contract review meeting minutes
  - Evidence of the competency of the appointed specialist water hygiene contractor and their operatives.
- 6.3 All records of activity undertaken by the water hygiene contractor will be available to SHG via a web-based portal that all relevant staff have access to. All other records will be held within SharePoint.
- 6.4 The format and content of the Legionella water risk assessments completed by the water hygiene contractor will be in line with ACOP L8 and BS 8580-1: 2019 Water Quality - Risk Assessments for Legionella Code of Practice

## **7 KEY ROLES AND RESPONSIBILITIES**

- 7.1 As stated in the SHG Group Health & Safety Policy, The Board, Chief Executive and the Senior Leadership Team recognise their moral and legal duty to ensure, so far as is reasonably practicable, the health, safety and welfare of employees (including apprentices, temporary and agency workers) and others e.g. customers, volunteers, visitors, work experience students, contractors etc. who may be affected by SHG work activities or attend SHG premises.
- 7.2 The Board, Chief Executive and the Senior Leadership Team have ultimate accountability and responsibility for the implementation of a Legionella management regime in line with this policy and for monitoring its effectiveness

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however have delegated day to day responsibility to operational staff within the organisation.

- 7.3 Day to day delivery of the Legionella management regime is by The Compliance Team, however there are also responsibilities on staff in other teams to manage Legionella risks.
- 7.4 Details of all staff who have a role and responsibility for Legionella management is provided in Appendix 3.
- 7.5 The Chief Executive will fulfil the role of Duty Holder on behalf of SHG.
- 7.6 The Responsible Person for Legionella Management is the Head of Compliance.
- 7.7 The current Deputy Responsible Persons for Legionella management is Asbestos and Legionella Advisor.
- 7.8 The roles and responsibilities of the water hygiene contractor are to be clearly specified within the contract terms and specification.

## **8 TRAINING**

- 8.1 The Head of Compliance will oversee a team of suitable qualified officers including the Asbestos and Legionella Advisor who will be qualified to a minimum of City & Guilds (WH003) Legionella Control Within Hot and Cold-Water Systems or BOHS P901 Legionella Management and Control.
- 8.2 Where there are specific tasks that staff are required to undertake, e.g. completion of a basic Legionella risk assessment on voids, the flushing of infrequently used outlets, instruction and guidance will be provided by The Compliance Team.
- 8.3 Legionella risk assessments and the ongoing management regime will be delivered by a specialist water hygiene contractor by suitably qualified and experienced operatives, as follows:
- Legionella risk assessors/reviewers – City & Guilds Legionella risk assessment qualification plus minimum of 2 years water hygiene/legionella experience.
  - Water hygiene technicians – BOHS P900, comparable City & Guilds qualification, plumbing/mechanical services qualification plus a minimum of 1-year practical water hygiene experience.

## **9 COMPLIANCE PERFORMANCE**

- 9.1 Monthly reviews are undertaken by The Compliance Team to monitor that corrective actions of L8 non-conformities are completed.
- 9.2 Compliance with the Legionella water risk assessment programme is reported monthly to the Operations Management Team. It is also reported annually to Senior Leadership Team and Audit & Risk Committee as part of the Compliance Annual Compliance Report.

- 9.3 The appointed water hygiene contractor will have an internal audit regime in place to audit a minimum of 5% of the Water Hygiene works completed, the results of which will be shared with The Compliance Team as part of contract review meetings.
- 9.4 An external audit regime will be implemented for Legionella, with an accredited consultant appointed to audit a percentage of Legionella water risk assessments undertaken by the Water Hygiene Consultants.

## **10 EQUALITY IMPACT ASSESSMENT (EIA)**

- 10.1 An Equality Impact Relevance Screening has determined that a EIA is not required.

## **11 OWNERSHIP, MONITORING & REVIEW**

- 11.1 The Policy is owned by the Operations Directorate and will be monitored by the Operations Management Team.
- 11.2 The Policy will be reviewed in line with the Operations Management Policy and Procedure Review Schedule.



## APPENDIX 1

### Written Schemes

Items to be included in the written scheme are as follows:

- a) An up to date plan of the plant or system layout (a schematic plan is enough),
  - Parts of the plant or system which are temporarily out of use
  - A description of the safe and correction operation of the system
  - The precautions to be taken
  - Types and frequency of checks to be carried out to ensure the success of the scheme
  - What to do if the scheme is found to be ineffective
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- b) Details on how to use and/or carry out:
  - The physical treatment programme (e.g. how to use temperature control for hot and cold water systems.)
  - Chemical treatment programme (including manufacturer's data on effectiveness, the concentrations and contact time required for the substance used)
  - Information on storage, handling, use and disposal of the chemical in use
  - System control parameters (plus allowable tolerances), physical, chemical and biological parameters, and measurement methods and sampling location, test frequencies and procedures for maintaining consistency
  - What to do in case the control limits are exceeded, including the channels of communications
  - Procedures for cleaning and disinfection
- c) The correct operation of the water-system plant should be described so that faults are easier to identify:
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  - Procedures for commissioning and re-commissioning
  - Procedures for shutdown
  - Checks for warning systems and diagnostic systems in case of system malfunction
  - Maintenance requirements and frequencies

**APPENDIX 2**

<b>Service</b>	<b>Action to take</b>	<b>Frequency</b>
<b>Calorifiers</b>	Inspect calorifier internally by removing the inspection hatch or using a boroscope and clean by draining the vessel. The frequency of inspection and cleaning should be subject to the findings and increased or decreased based on conditions recorded	Annually, or as indicated by the rate of fouling
	Where there is no inspection hatch, purge any debris in the base of the calorifier to a suitable drain Collect the initial flush from the base of hot water heaters to inspect clarity, quantity of debris, and temperature	Annually, but may be increased as indicated by the risk assessment or result of inspection findings
	Check calorifier flow temperatures (thermostat settings should modulate as close to 60 °C as practicable without going below 60 °C) Check calorifier return temperatures (not below 50 °C).	Monthly
<b>Hot water services</b>	For non-circulating systems: take temperatures at sentinel points (nearest outlet, furthest outlet and long branches to outlets) to confirm they are at a minimum of 50 °C within one minute (55 °C in healthcare premises)	Monthly
	For circulating systems: take temperatures at return legs of principal loops (sentinel points) to confirm they are at a minimum of 50 °C (55 °C in healthcare premises). Temperature measurements may be taken on the surface of metallic pipework	Monthly
	For circulating systems: take temperatures at return legs of subordinate loops, temperature measurements can be taken on the surface of pipes, but where this is not practicable, the temperature of water from the last outlet on each loop may be measured and this should be greater than 50 °C within one minute of running (55 °C in healthcare premises). If the temperature rise is slow, it should be confirmed that the outlet is on a long leg and not that the flow and return has failed in that local area	Quarterly (ideally on a rolling monthly rota)
	All HWS systems: take temperatures at a representative selection of other points (intermediate outlets of single pipe systems and tertiary loops in circulating systems) to confirm they are at a minimum of 50 °C (55 °C in healthcare premises) to create a temperature profile of the whole system over a defined time period	Representative selection of other sentinel outlets considered on a rotational basis to ensure the whole system is reaching satisfactory temperatures for legionella control
<b>POU water heaters (no greater than 15 litres)</b>	Check water temperatures to confirm the heater operates at 50–60 °C (55 °C in healthcare premises) or check the installation has a high turnover	Monthly–six monthly, or as indicated by the risk assessment

<b>Combination water heaters</b>	Inspect the integral cold water header tanks as part of the cold water storage tank inspection regime, clean and disinfect as necessary. If evidence shows that the unit regularly overflows hot water into the integral cold water header tank, instigate a temperature monitoring regime to determine the frequency and take precautionary measures as determined by the findings of this monitoring regime	Annually
	Check water temperatures at an outlet to confirm the heater operates at 50–60 °C	Monthly
<b>Cold water tanks</b>	Inspect cold water storage tanks and carry out remedial work where necessary	Annually
	Check the tank water temperature remote from the ball valve and the incoming mains temperature. Record the maximum temperatures of the stored and supply water recorded by fixed maximum/minimum thermometers where fitted.	Annually (Summer) or as indicated by the temperature profiling
<b>Cold water tanks</b>	Water sampling will be undertaken from tanks where it supplies drinking water.	Quarterly
<b>Cold water services</b>	Check temperatures at sentinel taps (typically those nearest to and furthest from the cold tank but may also include other key locations on long branches to zones or floor levels). These outlets should be below 20 °C within two minutes of running the cold tap. To identify any local heat gain, which might not be apparent after one minute, observe the thermometer reading during flushing	Monthly
	Take temperatures at a representative selection of other points to confirm they are below 20 °C to create a temperature profile of the whole system over a defined time period. Peak temperatures or any temperatures that are slow to fall should be an indicator of a localised problem	Representative selection of other sentinel outlets considered on a rotational basis to ensure the whole system is reaching satisfactory temperatures for legionella control
	Check thermal insulation to ensure it is intact and consider weatherproofing where components are exposed to the outdoor environment	Annually
<b>Showers and spray taps</b>	Dismantle, clean and descale removable parts, heads, inserts and hoses where fitted	Quarterly or as indicated by the rate of fouling or other risk factors, eg areas with high risk patients
<b>POU filters</b>	Record the service start date and lifespan or end date and replace filters as recommended by the manufacturer (0.2 µm membrane POU filters should be used primarily as a temporary control measure while a permanent safe engineering solution is developed, although long-term use of such filters may be needed in some healthcare situations)	According to manufacturer's guidelines
<b>Base exchange softeners</b>	Visually check the salt levels and top up salt, if required. Undertake a hardness check to confirm operation of the softener	Weekly, but depends on the size of the vessel and the rate of salt consumption

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	Service and disinfect	Annually, or according to manufacturer's guidelines
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<b>Multiple use filters</b>	Backwash and regenerate as specified by the manufacturer	According to manufacturer's guidelines
<b>Infrequently used outlets</b>	<p>Consideration should be given to removing infrequently used showers, taps and any associated equipment that uses water. If removed, any redundant supply pipework should be cut back as far as possible to a common supply (eg to the recirculating pipework or the pipework supplying a more frequently used upstream fitting) but preferably by removing the feeding 'T'</p> <p>Infrequently used equipment within a water system (ie not used for a period equal to or greater than seven days) should be included on the flushing regime</p> <p>Flush the outlets until the temperature at the outlet stabilises and is comparable to supply water and purge to drain</p> <p>Regularly use the outlets to minimise the risk from microbial growth in the peripheral parts of the water system, sustain and log this procedure once started</p> <p>For high risk populations, eg healthcare and care homes, more frequent flushing may be required as indicated by the risk assessment</p>	Weekly, or as indicated by the risk assessment
<b>TMVs</b>	<p>Risk assess whether the TMV fitting is required, and if not, remove</p> <p>Where needed, inspect, clean, descale and disinfect any strainers or filters associated with TMVs</p> <p>To maintain protection against scald risk, TMVs require regular routine maintenance carried out by competent persons in accordance with the manufacturer's instructions. There is further information in paragraphs 2.152– 2.168</p>	Annually or on a frequency defined by the risk assessment, taking account of any manufacturer's recommendations
<b>Expansion vessels</b>	<p>Where practical, flush through and purge to drain.</p> <p>Bladders should be changed according to the manufacturer's guidelines or as indicated by the risk assessment</p>	Monthly–six monthly, as indicated by the risk assessment

**APPENDIX 3**

<b><u>POST</u></b>	<b><u>DUTY/RESPONSIBILITIES</u></b>
Chief Executive	<ul style="list-style-type: none"> <li>• To act as the SHG Legionella Duty Holder.</li> <li>• To appoint a Responsible Person and Deputy Responsible Persons to be the operational leads on Legionella risk compliance</li> <li>• Overall responsibility and accountability for ensuring that effective health and safety arrangements are in place to manage Legionella risks.</li> <li>• Ensure that sufficient resources are available to enable the management arrangements to be effectively implemented.</li> </ul>
Head of Compliance	<ul style="list-style-type: none"> <li>• To act as the SHG Legionella Responsible Person</li> <li>• Overall responsibility and accountability for ensuring the implementation and delivery of the Legionella management regime in line with the Legionella Policy.</li> <li>• To ensure the Legionella management regime is delivered in line with the required frequency and to the correct properties and buildings</li> <li>• To regularly review KPI performance and budget spent and instigate corrective action where needed.</li> <li>• To report on Legionella performance to Senior Management.</li> <li>• To lead on the appointment of a specialist water hygiene contractor</li> <li>• To regularly review the Legionella Policy and Procedure to ensure remain up to date and relevant.</li> <li>• Monitor and review the written schemes to ensure they are effective Report any areas of concern to the Executive Director of Operations as they feel appropriate.</li> <li>• To co-operate with the SMBC Proper Officer in the investigation of any suspected cases of Legionella reported by a medical practitioner to the Local Authority (i.e. SMBC).</li> </ul>
Compliance Manager	<ul style="list-style-type: none"> <li>• To provide regular updates to the Head of compliance on KPI performance, completion of L8 non-conformities and contractor performance. To support the Asbestos &amp; Legionella Advisor in reviewing L8 nonconformities and instigating corrective actions.</li> <li>• To ensure regular contract review meetings are held with the water hygiene contractor and performance monitored on a day to day basis.</li> </ul>
Asbestos & Legionella Advisor	<ul style="list-style-type: none"> <li>• To act as the SHG Legionella Deputy Responsible Person</li> <li>• To make decisions and take actions in the absence of the Responsible Person.</li> <li>• To provide technical advice and support to the Responsible Person to aid decision making.</li> <li>• To review L8 non conformities and instigate corrective actions ensuring they are completed in a timely manager by appropriate contractors.</li> <li>• Allocate responsibilities for carrying the control measures identified in the written scheme.</li> </ul>

	<ul style="list-style-type: none"> <li>• To accurately maintain the systems for monitoring Legionella management regimes and L8 non-conformities.</li> <li>• To monitor Legionella risk assessment and management regimes schedules to ensure completed when due, highlighting any potential deviances to the M&amp;E Officer (Asbestos &amp; Legionella)</li> <li>• Ensure appropriate statutory and evidential records are maintained for each premises.</li> <li>• To highlight any water hygiene contractor performance issues to the M&amp;E Officer (Asbestos &amp; Legionella) and the M&amp;E Manager.</li> <li>• To raise works to address L8 nonconformities and monitor completion.</li> <li>•</li> <li>• To highlight any water hygiene contractor performance issues to the Compliance Manager.</li> </ul>
Head of Development	<ul style="list-style-type: none"> <li>• Ensure The Compliance Team is informed of any new developments so that any necessary water management regimes can be considered and implemented.</li> <li>• Ensure The Compliance Team have access to the health and safety documentation required for new build properties.</li> <li>• To ensure that the water system in new developments are so designed and constructed that it will be safe and without unacceptable risks to health when used.</li> <li>• To ensure corrective action is taken where “latent defects” are discovered regarding Water Safety.</li> </ul>
Head of Assets	<ul style="list-style-type: none"> <li>• Ensure a Legionella dwelling risk assessments is completed for every void and any L8 non conformities are addressed in a timely manner.</li> </ul> <ol style="list-style-type: none"> <li>1. Ensure that when a property becomes void all hot and cold-water outlets are flushed by running the taps for 2 minutes, at the beginning and end of void works</li> </ol> <ul style="list-style-type: none"> <li>• Ensure that Legionella control is considered during repairs and refurbishment works, e.g. removal of dead legs and blind ends, use of WRAS approved products.</li> <li>• To inform The Compliance Team should any significant changes be made to water systems.</li> </ul>
Head of Health and Safety	<ul style="list-style-type: none"> <li>• Provides technical support and advice as required.</li> <li>• To support the Responsible Person in their investigations should there be a suspected Legionella outbreak.</li> </ul>
People and Organisational Development Manager	<ul style="list-style-type: none"> <li>• To facilitate the delivery of Legionella related training to relevant staff</li> </ul>