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Policy Name	Legionella Management Policy and Management Plan
Policy Author	Deputy Director
Approved by Sub Committee	21st Nov 2022 Performance, Assurance & Risk (PA&R) Sub Committee
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HAPPY TO TRANSLATE

1. Introduction

This policy details the approach to be taken by WWHC to manage the control of Legionella within the Co-operative's housing stock and office buildings and CRC.

1.1. Statement of Objectives

The Legionella Management Policy aims to ensure that WWHC effectively administers compliance with its landlord obligations in respect of legionella management and thereby seeks to provide assurance to WWHC's Management Committee. The main objectives of this policy include:

- ensuring that systems are in place to enable WWHC to comply with its duties in relation to Health and Safety at Work Act 1974, Management of Health and Safety at Work Regulations 1999, Control of Substances Hazardous to Health Regulations 2002, and Approved Code of Practice L8 Legionnaires' Disease: The Control of Legionella Bacteria in Water Systems;
- operating an effective legionella management system;
- ensuring that an audit trails exist within the legionella management process;
- reviewing policies, procedures and systems regularly to ensure they are up to date and reflect current best practice guidance and legislation;
- Identifying all water plant and systems which present a potential risk of exposure to legionella bacteria;
- Monitoring compliance with the written scheme and review risks and the performance of the risk control measures, revising risk assessments and written control schemes as required.
- Employing only competent, adequately qualified and trained personnel and service providers.
- British Standard; BS 8580-1:2019 (Water quality. Risk assessments for legionella code of practice) and HSG274 (parts1-3) Legionnaires' disease

1.2. Expected Outcomes

Key outcomes of operating an effective Legionella Management Policy include:

- that all employees, customers, visitors are not exposed to any risk arising from legionella when visiting or occupying any buildings under our management.

1.3. Equalities

We are committed to ensuring equal opportunities and fair treatment for all people in our work. In implementing this Policy, we will provide a fair and equal service to all people, irrespective of factors such as gender, race, disability, age, sexual orientation, language or social origin, or other personal attributes.

2. Business Plan and Risk Management

WWHC's business plan reflects the legionella management responsibility/requirements of a landlord. We mitigate against business risk through managing legionella in an efficient, effective and economic manner.

3. Roles and Responsibilities

WWHC's Management Committee and Senior Staff Team will monitor the implementation of this policy to ensure that it is properly operated, that there is appropriate officer involvement in the processes used in managing legionella, and that there is effective scrutiny of the Legionella Management Policy.

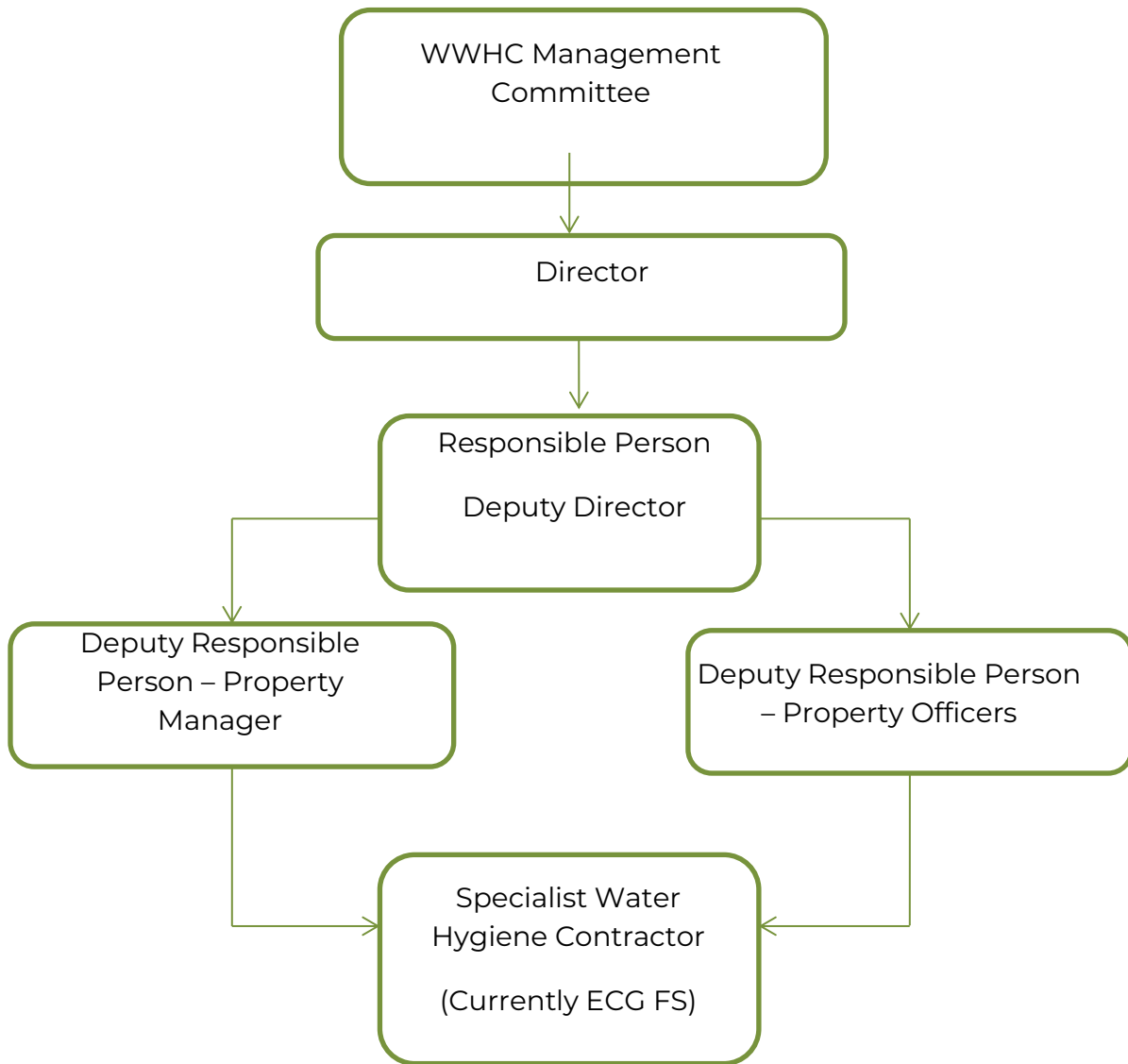
The Management Committee will ensure that the Legionella Management Policy is meeting its intended objectives and that appropriate monitoring and reporting of activities takes place.

In implementing its Legionella Management Policy certain functions are the responsibility of the Management Committee or nominated sub-committee, although staff members have delegated authority to undertake many tasks.

The L8 ACoP requires that as part of our Management Policy certain roles are defined, the following persons have responsibilities under this policy:

Role	Name	Function / task	Responsibility
Duty holder	Director	Legal duty holder for health and safety	Corporate responsibility to ensure that WWHC is implementing and complying with legal health and safety obligations.
Ongoing monitoring	Property Manager / Deputy Director	Monitor health and safety	Monitor performance against policy
Ongoing monitoring	Property Manager / Deputy Director	Overall management responsibility for legionella management	Responsible for the operational procedures that reflect the principles set out within the Legionella Management Policy.
Deputy responsible persons	Property Officers	Implementation and delivery of Legionella Management Policy	Undertake the day to day management responsibility for implementing this policy
Risk assessments and L8 works	Legionella Contractor	Provide specialist services in relation to the management of legionella	Undertake the required risk assessments, mitigation and monitoring measures as required under their appointment

The lines of communication between the roles identified within section 7.4 of the ACOP are as follows:



4. Legionella Bacteria and Legionnaires Disease

Legionella bacteria are common in natural water course such as rivers and ponds. Since legionella are widespread in the environment, they may contaminate and grow in other water systems such as cooling towers, evaporative condensers, showers, spray apparatus and hot and cold water systems.

Legionella bacteria are usually associated with larger water systems, for example in factories, hospitals and hotels but the bacteria can also populate smaller water systems used in homes or residential accommodation. Further potential sources of legionella bacteria include spa and whirlpool baths, humidifiers, water features and fire suppression systems (sprinklers and hose reels).

Legionnaires Disease is a potentially fatal form of pneumonia caused by the inhalation of legionella bacteria. This includes the most serious legionnaires' diseases, as well as the similar but less serious conditions of Pontiac Fever and Lochgoilhead Fever. The bacteria is normally contained within fine water droplets (aerosol) that may be caused by operating a cooling tower, shower, spray apparatus, running a tap outlet or operating a humidifier. There is no evidence that Legionnaires Disease can be contracted from person to person or by drinking water contaminated by legionella bacteria.

Legionnaires Disease has the potential to affect anybody. However, persons more susceptible are normally in the age range of 45 and above, smokers, heavy drinkers, persons suffering from chronic respiratory or kidney disease and persons with impaired immune systems.

Healthy persons are not immune from catching Legionnaires Disease. A large proportion of reported cases of Legionnaires Disease within the UK each year are those returning from foreign travel. The identification of legionella bacteria within a water system is NOT an outbreak, this is ONLY the case when two or more persons have contracted the disease from the same source.

Legionella survive low temperatures and thrive at temperatures between 20-45°C if the conditions are right, e.g. if a supply of nutrients is present such as rust, sludge, scale and other bacteria. The legionella bacteria are killed by high temperatures.

4.1. WWHC's Duties Under the Law

As an employer and a landlord in control of premises, WWHC must:

- identify and assess sources of risk;

- prepare a scheme for preventing or controlling the risk;
- implement and manage the scheme;
- keep records and check what has been done is effective

4.2. Assessing the Risk of WWHC Assets

WWHC shall undertake the necessary steps to assess sources of risk across our asset base. To achieve this we shall carry out a suitable and sufficient assessment to identify and assess the risk of exposure to legionella bacteria from the water systems contained within our properties.

We shall ensure that the risk assessment identifies and evaluates:

- the particular means of preventing exposure to legionella bacteria; or
- if prevention is not reasonably practicable, the particular means of controlling the risk from exposure to legionella bacteria
- the risk to health, whether the potential harm to health from exposure is reasonably foreseeable, unless adequate protections are taken;
- the necessary measures to prevent, or adequate control, the risk from exposure to legionella bacteria.

Where required, WWHC shall employ the services of a competent person to undertake the risk assessments.

The risk assessments shall be regularly reviewed and updated where it is believed that the original risk assessment is no longer valid.

The risk assessment shall take into account the following factors:

- evaluate the nature of each site;
- consider the whole system, and not individual parts of the system;
- presence of legionella bacteria;
- conditions suitable for growth of the organisms, e.g. suitable water temperatures 20°C – 45°C; and presence of nutrients such as sludge, scale, rust, algae or other organic matter;
- are there means of creating and spreading breathable droplets, e.g. the aerosol generated by cooling towers, shower or spa pools;

- the presence of occupants that would be classes as vulnerable, including quantifying the numbers;
- the source of system supply water;
- possible sources of contamination;
- plant operating characteristics;
- unusual, but foreseeable operating conditions;
- use of disinfection systems;
- review of control measures;
- local environment.

4.3. Training and Competence

An assessment shall be undertaken to assess the training requirements of the persons with responsibilities under this policy. Training should be undertaken by each relevant person to ensure that they have the requisite knowledge and competence to undertake their appointed role.

Refresher training should be undertake on a periodic basis, particularly where changes to regulation, approved codes of practice or best practice occurs.

Where WWHC appoints a contractor to undertake water hygiene works, this contractor shall be required to demonstrate its competence to undertake the required tasks. As a minimum requirement, contractors are required to be a registered member of the Legionella Control Association (LCA).

4.4. Record Keeping

WWHC understands the importance of accurate record keeping, and shall undertake the following in relation to the management of legionella within our properties:

- WWHC shall maintain a record of all legionella risk assessments which have been carried out,
- WWHC shall maintain a record of all mitigation/risk reduction works carried out or required on a regular basis;
- WWHC shall maintain a record of all monitoring and checks that are carried out, these should be recorded within each properties log book;

- WWHC shall maintain legionella log books at each commercial property; these shall be regularly updated with the required information. Each log book should be made available for both the facilities management company and water hygiene specialist contractor, and any other relevant party;

The process of record keeping shall be constant in accordance with the timescales set out within in the legionella management plan. All legionella records shall be retained for a minimum period of five years.

4.5. Notification Requirements

Should an employee of WWHC contract legionellosis resulting from work relating to hot water systems which are suspected to be contaminated with legionella, the Association shall report the incident under 'Reporting or Injuries', Diseases and Dangerous Occurrences Regulations (RIDDOR).

5. Monitoring & Review

WWHC will publicise its Legionella Management Policy.

WWHC will review its methodology for managing legionella every three years or sooner if required by statutory, regulatory or best practice requirements

The Responsible Person and/or deputies shall provide regular reports on WWHC's performance in relation to the management of legionella. These reports should detail the outcome from any new or updated risk assessment, details of any on-going mitigation works and confirmation that the appropriate mitigation strategies are being followed.

Legionella Management Plan

Introduction

The Approved Code of Practice - Legionnaires Disease, the control of legionella bacteria in water systems (L8) requires that we have a written scheme setting out the approach to be taken by WWHC in controlling the risk of legionella. Within this document we have set out the approach to be taken for both domestic and commercial premises.

Precautionary measures

WWHC's primary objective is to avoid the conditions which permit legionella to proliferate and to avoid creating a spray or aerosol. It is accepted that the legionella bacteria is present in most water systems, but by undertaking good housekeeping we are able to minimise the conditions in which it would be able to multiply. We shall ensure that:

- systems are operated safely and correctly and are well maintained;
- materials are avoided that can harbour or provide nutrient for micro-organisms;
- nutrient is prevented from entering the systems where possible;
- the building-up of sediments, scale deposits and corrosion is avoided;
- suitable water treatment programmes are implemented where it is appropriate and safe to do so;
- stagnation of water is prevented;
- water is stored below 20°C or above 60°C;
- water is distributed below 20°C or above 60°C;

Relevant Persons/Parties

The following persons/parties have day to day responsibility for the delivery of this Plan:

Name	Role	Contact
Grant Clayton – Deputy Director, Property	Responsible Person	0141 641 8628
Jeanette McGrory, Property Manager	Deputy Responsible Person	0141 641 8628
Water Hygiene Contractor – Domestic	ECC Facilities Services	01698 828778
Heating Maintenance Contractor	City Technical Services	0844 579 6493

Legionella Management Plan – Domestic Premises

It is generally accepted that levels of legionella bacteria found in typical domestic mains water supplies are very low (normally below the detectable limit) and do not pose a serious risk providing they are not allowed to proliferate. The survival and growth of legionella bacteria are governed by a number of factors which include:

- water temperature;
- water retention period;
- accumulation of sludge, scale, deposits and corrosion by-products;
- use of unsuitable materials;
- low levels of disinfectants and other biocide treatments;

Experience has shown that while it can be difficult to completely eradicate legionella bacteria from building water systems, the risks can be reduced to an acceptable and manageable level by the adoption of a suitable programme of system design and risk management and control.

When considering WWHC's domestic stock, we can broadly split the stock into two categories, these being direct main water supply, and indirect cold

water storage tank supplied properties. We have conducted the following assessment to establish the level of risk associated with each category:

Category 1 – Domestic direct main with a non-storage water heat (gas combi boiler or electric instantaneous water heater – NB and LR Flats)

Property Characteristic	Property Assessment Details	Low	Medium	High
Type of water supply?	Direct mains supply	✓		
Occupant characteristics?	Varied ranging from age range and health conditions	✓		
No. occupants?	Generally between 1 – 8	✓		
Type of heating & hot water system?	Gas combi boiler or electric instantaneous water heater	✓		
Water temperature?	Boiler hot water set to greater than 45°C	✓		
Maintenance regime?	Annual heating system service	✓		
Showers present	Not all properties will have showers fitted, for purpose of assessment assumed that all have.	✓		

Category 2 – Gravity fed water system without recirculation (MSF Flats Only)

Property Characteristic	Property Assessment Details	Low	Medium	High
Type of water supply?	Indirect water supply, via cold water storage tank		✓	
Occupant characteristics?	Varied ranging from age range and health conditions	✓		
No. occupants?	Generally between 1 – 8	✓		
Type of heating & hot water system??	Biomass DH	✓		
Water temperature?	HIU hot water set to greater than 45°C	✓		
Maintenance regime?	Bi-Annual HIU service	✓		
Showers present	Not all properties will have showers fitted, for purpose of assessment assumed that all have.	✓		
Spa pools present	Non Present in WWHC's stock	✓		

Considering the above assessment in relation to WWHC's domestic stock, we can see that generally across the range of property categories that there is a relatively low risk of legionella.

There is one areas identified in the assessment that have been assessed as medium risk due to the type of water supply and source of hot water.

Written Scheme of Control

Risk control strategy - domestic

Having considered the classifications above, we have implemented the following risk control strategies:

Low risk housing stock (Category 1)

The majority of WWHC's housing stock falls into this category, where properties have modern direct water supplies. To minimise the risk we shall:

- undertake annual maintenance (HIU units bi-annual) of heating and hot water systems within our properties.
- when works are carried out in our properties; where it affects the water systems; specifications should include details of our requirement to ensure works remove the opportunity for stagnant water, i.e. dead legs;
- where new works are specified within our properties, these shall be completed to comply with current water hygiene requirements;

Annually we shall communicate; by way of letter or newsletter article; with our customer advising of the risk of legionella and as measures that they can undertake to ensure the risk is minimised, this should include advise on:

- customers not adjusting hot water and boiler controls from their settings;
- customers to advise WWHC as soon as they have any issues with the operation of their boiler;
- customers to advise us as soon as they notice that their cold water supply is running warm after a few minutes
- customers to advise WWHC if they notice changes in their water supply, particularly debris and discolouration
- where showers are fitted, it is the tenants responsibility to ensure that if not in regular use that the shower is ran for 2 minutes each week, and;
- regardless of frequency of use, that the tenant cleans and disinfected the shower head regularly, at least every six months;

- where other water appliance and/or outlets (i.e. taps and WCs) are not used on a regular basis, these should be periodically used to ensure water is circulating within the system.

Medium risk housing stock (Category 2)

In addition to the measures listed for low risk housing stock, WWHC shall also under take the following items:

- WWHC shall appoint a competent contractor to undertake a site specific risk assessment for each location classed as medium risk, these assessment should be conducted every two years, or where changes to the system occur;
- WWHC shall undertake all risk reduction and preventative measures as identified within said risk assessments;
- WWHC acknowledges that cold water storage systems prevent a higher risk of legionella than direct water supplies. WWHC shall allow within its future expenditure programme for the replacement of cold water storage tanks with direct supplies where it is practical to do so.
- Carry out monthly temperature checks for all communal tanks and laundry outlets
- Carry out 6 monthly sampling for all cold water storage tanks

Risk Control Strategy –Office / CRC Premises

To comply with our requirements for our commercial properties; and due to the more complex water systems within these; WWHC shall appoint a competent water hygiene contractor to undertake site specific risk assessment.

Main office premises

- WWHC shall appoint a competent contractor to undertake a site specific risk assessment for each location, these assessment should be reviewed and updated regularly, or where changes to the system occur;
- WWHC shall undertake all risk reduction and preventative measures as identified within said risk assessment;

- WWHC shall implement a maintenance programme to ensure all appliances are services and maintenance to a good standard;
- WWHC shall undertake or appoint a contractor to undertake a programme of inspections/testing and samples to monitor the waters systems within each premises;
- WWHC shall maintain written records at each site documenting the risk assessment, mitigation works and monitoring. These documents should be readily for inspection.

Main office premises - maintenance and monitoring programme

WWHC shall appoint competent contractors; or where suitable undertake the inspection/monitoring in house; to undertake the following items of maintenance and monitoring. In doing so we shall ensure that the conditions for legionella bacteria are minimised. The programme shall follow the guidelines issued by the HSE in HSG274 Part 2, a copy of which is included below in Table 1.

WWHC recognise that a key step in preventing legionella is the proper maintenance and operation of plant and systems. In addition to the specific details in Table 1, WWHC shall also appoint competent contractors to undertake regular maintenance to ensure correct operation and performance.

Table 1 - Reproduced from HSE HSG274 Part 2 2014

Service	Action to be taken	Frequency
Calorifiers	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
Hot water services	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	Monthly

Service	Action to be taken	Frequency
	<p>measurements may be taken on the surface of metallic pipework</p>	
	<p>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</p>	<p>Quarterly (ideally on a rolling monthly rota)</p>
	<p>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</p>	<p>Representative selection of other sentinel outlets considered on a rotational basis to ensure the whole system is reaching satisfactory temperatures for legionella control</p>
<p>POU water heaters (no greater than 15 litres)</p>	<p>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</p>	<p>Monthly–six monthly, or as indicated by the risk assessment</p>

Service	Action to be taken	Frequency
Combination water heaters	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
Cold water tanks	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
Cold water services	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	Monthly

Service	Action to be taken	Frequency
	minute, observe the thermometer reading during flushing	
	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 weather proofing where components are exposed to the outdoor environment	Annually
Showers and spray taps	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, e.g. areas with high risk patients
Base exchange softeners	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
	Service and disinfect	Annually, or according to manufacturer's guidelines
Multiple use filters	Backwash and regenerate as specified by the manufacturer	According to manufacturer's guidelines
Infrequently used outlets	Consideration should be given to removing infrequently used showers, taps and any associated equipment that uses water. If removed, any redundant supply pipework should	Weekly, or as indicated by the risk assessment

Service	Action to be taken	Frequency
	<p>be cut back as far as possible to a common supply (e.g. to the recirculating pipework or the pipework supplying a more frequently used upstream fitting) but preferably by removing the feeding 'T'. Infrequently used equipment within a water system (i.e. not used for a period equal to or greater than seven days) should be included on the flushing regime. Flush the outlets until the temperature at the outlet stabilises and is comparable to supply water and purge to drain. 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. For high risk populations, e.g. healthcare and care homes, more frequent flushing may be required as indicated by the risk assessment.</p>	
TMVs	Risk assess whether the TMV fitting is required, and if not, remove	Annually or on a frequency defined by the risk assessment, taking

Service	Action to be taken	Frequency
	<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>	<p>account of any manufacturer's recommendations</p>
Expansion vessels	<p>Where practical, flush through and purge to drain. Bladders should be changed according to the manufacturer's guidelines or as indicated by the risk assessment</p>	<p>Monthly–six monthly, as indicated by the risk assessment</p>

Record keeping

For our main office premises WWHC shall maintain site specific records of the management of legionella; these records shall be held on site. Each site record shall include the following information:

- Policy and Legionella Management Plan;
- Live risk assessment;
- Copy of historic risk assessments;
- Schematic of system;
- Details and schedule of maintenance visits;
- Details and schedule of monitoring and sampling;
- Details of responsible person and parties;
- Results of monitoring, samples and testing;

All records should be kept for a minimum of 5 years.

Water systems design

Where WWHC has commissioned the design or construction of water systems, whether in domestic or commercial properties, these works should be completed to minimise the colonisation and growth of legionella bacteria within the water system. The systems must be designed and installed in accordance with:

- Construction Design and Management Regulation 2015
- Scottish Water Byelaws 2004;
- Scottish Building Regulations
- BS EN 806 (Parts 1-5) Specifications for Installations inside buildings conveying water for human consumption;
- BS 8558 Guide to the design, installation, testing and maintenance of services supplying water for domestic use within buildings and their curtilages;
- CIBSE Guide G Public Health and Plumbing Engineering

Commissioning

In terms of the management of legionella, the period of time from installation and filling through to commissioning is potentially the most hazardous period for the development of legionella bacteria. Prior to commissioning a risk assessment should be undertaken to identify the

potential for stagnation in the system which could lead to the development of microbiological growth.

As a minimum all new water systems should be flushed out and disinfected. The commissioning process should be adjusted according to the type of system and the length of time between commissioning and occupation.

Void properties

During the void inspection, the outlets / showers where applicable, will be flushed for a minimum of 5 minutes. The process will be repeated at the post inspection stage. This will be recorded on the void inspection sheet.

Where a property is taken out of occupation for prolonged period of times, it should be managed to prevent microbiological growth. In general we should aim to leave systems filled with water. By leaving the systems filled with water we remove the risk of pockets of water left in drained down system from developing biofilm and help to prevent failures in the systems associated with drying out.

When the property is to be re-occupied, these water systems should be re-commissioned as if they were new; including flushing, cleaned and disinfection; before being returned to use.

Shared premises

Where the situation arises that WWHC owns or is operating within shared premises, it must be established where the responsibilities lies in terms of the control of legionella.

WWHC should within the terms of any lease/tenancy or contract, identify clearly who the duty holder shall be and the extent of that responsibility.

Action to be taken if there is an outbreak of Legionellosis

In Scotland under the Public Health (Notification of Infectious Diseases) Regulation 2010 human diagnostic laboratories must notify Health Protection Scotland of microbiologically confirmed cases of Legionnaires' disease.

An outbreak is defined as two or more cases where the onset of illness is closely linked in time and where there is epidemiological evidence of a common source of infection, with or without microbiological evidence.

Where an outbreak is identified the local authority shall implement their infectious diseases incident plan to investigate the outbreak, the local authority shall appoint the Proper Officer whose primary purpose is to protect public health.

Where an outbreak has occurred from suspected infringements of the regulations, then the enforcing authority shall investigate and take appropriate enforcing action. Enforcing authority shall be HSE or local authority Environmental Health Officers.

If an outbreak was identified that involved WWHC properties, WWHC would liaise with and assist the local authority investigation. Where a water system in the ownership of WWHC was implicated within the outbreak investigation, immediate emergency treatment works of that system would be instructed.

Monitoring and review

There should be constant monitoring of compliance against the Legionella management plan to ensure that all mitigation measures are being implemented. The plan should also be updated to account for new risk, and/or updated mitigation measures.

This will be reported to the Performance Assurance and Risk Sub Committee under the Landlords H&S KPI Framework.

The Legionella management plan should be reviewed in its entirety in line with the review of the Legionella Management Policy, or where legislative, regulatory or best practice changes/updates occur.

Policy Implementation Checklist

Equality and Diversity Compliant	Yes
Equality Impact Assessment required	Yes – see below
Data Protection (GDPR) compliant	Yes
Health & Safety compliant	Yes
Training requirements	Refresher for Property / CRC Staff
Regulatory Framework Assurance Information Bank Updated	N/A
Policy Implementation	
Reporting arrangements Performance and Risk Sub Committee Management Committee	Approval Ratifies Sub Committee Approval
Policy register updated	Yes
Published on Website	Yes
Publicity material issued	N/A

West Whitlawburn Housing Co-operative

Equalities Impact Assessment

Policy	Legionella	New policy or revision of existing?	Revision of existing
Person(s) responsible for assessment		Grant Clayton	
1. Briefly describe the aims, objectives and purpose of the policy.	The purpose of this policy is to set out how WWHC will manage its water storage tanks located within its stock to mitigate the risk of a Legionella outbreak. This policy aims to mitigate so far as is reasonably practicable the risks associated with Legionella as a result of poor water management and testing. The objective is to highlight how Legionella growth and outbreak is going to be managed by the Duty holder and the Responsible person.		
2. Who is intended to benefit from the policy? (e.g. applicants, tenants, staff, contractors)	All staff, tenants and the general public who may be affected by legionella from working on or using outlets from cold and/hot water storage.		
3. What outcomes are wanted from this policy? (e.g. the measurable changes or benefits to members/ tenants / staff)	To ensure that Legionella is managed and that through regular testing and risk assessments continues to be managed thus mitigating the risks to staff, tenants contractors and the general public.		
4. Which groups could be affected by the policy? (note all that apply)			
Age		Disability	
Gender reassignment		Marriage and Civil Partnership	
Pregnancy and Maternity		Race	
Religion or Belief		Sex	
Sexual Orientation			

5. If the policy is not relevant to any of the equality groups listed above, state why and end the process here.

This policy is a general health and safety policy and none of the equality groups listed above are affected by this policy

6. Have those affected by the policy / decision been involved?

7. Describe the likely positive or negative impact(s) that the policy could have on the groups identified above.

Positive Impact(s)

Negative Impact(s)

8. What actions are required to address the impacts arising from this assessment? (This might include: additional data, putting monitoring in place, making adjustments, taking specific action to mitigate any potentially negative impacts)

Signed:

Grant Clayton

Dated:

14/11/2022