



WGHC

Our tenants are paramount in everything we do

LEGIONELLA AND WATER MANAGEMENT POLICY

This policy was approved by the Committee of Management on Wednesday 15th March 2023. It should be reviewed again no later than 28th February 2026.

The policy has been assessed through the organisational impact assessment process.

We can, if requested, produce this document in different formats such as larger print or audio-format. We can also translate the document into various languages, as appropriate.

SCOTTISH HOUSING REGULATOR STANDARDS

STANDARD 1

The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users.

STANDARD 2

The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users and stakeholders. Its primary focus is the sustainable achievement of these priorities.

STANDARD 4

The Governing body bases its decisions on good quality information and advice and identifies and mitigates risks to the organisation's purpose.

STANDARD 5

The RSL conducts its affairs with honesty and integrity.

STANDARD 6

The Governing body and senior officers have the skills and knowledge they need to be effective.

WEST GRANTON HOUSING CO-OPERATIVE LIMITED
26 Granton Mill Crescent Edinburgh EH4 4UT
Tel: 0131 551 5035 Email: mail@westgrantonhc.co.uk

West Granton Housing Co-operative Limited is a fully mutual housing co-operative registered as a social landlord with the Scottish Housing Regulator (HAC 225); and is a registered society under the Co-operative and Community Benefit Societies Act 2014 (2357 RS).



Contents

| | | |
|--|---|---|
| 1.0 | PURPOSE | 3 |
| 2.0 | DEFINITIONS..... | 3 |
| 3.0 | REFERENCES..... | 3 |
| 4.0 | LEGAL DUTIES..... | 3 |
| 5.0 | LEGIONELLA INFORMATION | 4 |
| 6.0 | LEGIONELLA POLICY..... | 4 |
| 7.0 | RISK ASSESSMENT | 4 |
| 8.0 | WATER FITTINGS AND SYSTEM REQUIREMENTS..... | 5 |
| 9.0 | DISINFECTION | 5 |
| 10.0 | VOID PROPERTY ACTIONS | 5 |
| 11.0 | CONTRACTORS | 6 |
| 12.0 | NOTIFICATION REQUIREMENTS | 6 |
| 13.0 | TENANT RESPONSIBILITIES | 6 |
| 14.0 | IMPLEMENTATION AND REVIEW..... | 6 |
| APPENDIX 1 = EXAMPLE LEGIONELLA RISK ASSESSMENT..... | | 7 |

| | | | |
|------------------|--|---------------|---------------|
| Document Name: | Legionella and Water Management Policy | Version: | 1.0 |
| Created: | David Mills / WGHC | Version Date: | March 2023 |
| Owner: | David Mills / WGHC | Review Due: | February 2026 |
| Location / Path: | WGHC \X:\Governance\Policies & Procedures\Policy | Pages: | Page 2 of 11 |

1.0 PURPOSE

The aim of this procedure is to ensure the effective inspection, maintenance and management of all water systems within properties controlled by WGHC. The procedures detailed within this section have been written to ensure all reasonable steps have been taken to comply with The Control of Substances Hazardous to Health Regulations 2002 (as amended), The Water Supply (Water Fittings) (Scotland) Byelaws 2014 and all other relevant legislation.

2.0 DEFINITIONS

Legionella - “a potentially dangerous type of bacteria when inhaled with water vapour. Bacterium grows best in warm, nutrient rich water.”

Legionella Risk Assessment – “a specific risk assessment carried out to determine the risk level of Legionella Assessment proliferation, and exposure from a specific water system.”

Log Book – “a record book provided to record all local checks and tests carried out, as specified by legionella risk assessment.”

Legionnaires’ disease - “a potentially fatal form of pneumonia caused by the legionella bacteria.”

3.0 REFERENCES

- ❖ British Standards 8580:2010 – Water Quality: Risk Assessment for Legionella
- ❖ HSG Health and Safety in Residential Care Homes (2001)
- ❖ HSG274 Legionnaires Disease – Technical Guidance (in 3 Parts) (2013)
- ❖ IACL27 (rev2) Legionnaires Disease – A guide to Employers
- ❖ INDG 458 Legionnaires Disease – A brief Guide for Duty Holders (2012)
- ❖ Public Health etc. (Scotland) Act 2008
- ❖ The Building (Scotland) Regulations 2004
- ❖ The Control of Substances Hazardous to Health Regulations 2002 (as amended) • The Housing (Scotland) Act 2006
- ❖ The Management of Health and Safety at Work Regulations 1999
- ❖ The Private Water Supply (Scotland) 2006
- ❖ The Water Supply (Water Fittings) (Scotland) Byelaws 2014
- ❖ The Water Supply (Water Quality) (Scotland) Regulations 2001

4.0 LEGAL DUTIES

WGHC has several specific legal duties which relate to water safety and legionella risk management. These include:

- ❖ Preparing a scheme for preventing or controlling the risk;
- ❖ Identifying and assessing sources of risk;
- ❖ Implementing and managing the scheme;
- ❖ Keeping records and checking what has been done is effective.

| | | | |
|------------------|---|---------------|---------------|
| Document Name: | Legionella and Water Management Policy | Version: | 1.0 |
| Created: | David Mills / WGHC | Version Date: | March 2023 |
| Owner: | David Mills / WGHC | Review Due: | February 2026 |
| Location / Path: | WGHC \ X:\Governance\Policies & Procedures\Policy | Pages: | Page 3 of 11 |

5.0 LEGIONELLA INFORMATION

Legionella bacteria is common in natural water (such as rivers and ponds). However, legionella can grow in other water systems such as cooling towers, evaporative condensers, showers, spray apparatus and hot and cold water systems.

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 are 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.

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

Legionellae survive low temperatures and thrive at temperatures between 20-45 degrees C if the conditions are right (e.g. if a supply of nutrients is present such as rust, sludge, scale and other bacteria).

6.0 LEGIONELLA POLICY

WGHC will aim to minimise and control the risk from Legionnaires' disease and, to this end, will:

- ❖ Appoint a responsible person who will have a duty to put in place an action plan to minimise the risk of Legionella and to manage and monitor the necessary work systems and procedures;
- ❖ Assess the level of risk through a structured Legionella Risk Assessment programme (I-Auditor), and aim to eliminate or reduce the risk to an acceptable level;
- ❖ Arrange for routine inspection and maintenance of water systems, and where needed, a programme of disinfection;
- ❖ Retain records of maintenance, inspection and testing for a minimum of 5 years.

7.0 RISK ASSESSMENT

WGHC will arrange for a suitable and sufficient risk assessment programme to be carried out (and regularly reviewed) to identify and assess the risk of exposure to Legionella bacteria from all water systems across its property portfolio. I-Auditor shall be used for risk assessment. **See Appendix 1.**

All recommendations and remedial action will be recorded in a logbook. The recommendations should also highlight the management control actions that may be carried out in-house and those which would require an external contractor.

The risk assessment will be reviewed at regular intervals (at least every 2 years) or when it is believed that the original risk assessment is no longer valid (e.g. following a change in the building or water supply or following an incident).

| | | | |
|------------------|---|---------------|---------------|
| Document Name: | Legionella and Water Management Policy | Version: | 1.0 |
| Created: | David Mills / WGHC | Version Date: | March 2023 |
| Owner: | David Mills / WGHC | Review Due: | February 2026 |
| Location / Path: | WGHC \ X:\Governance\Policies & Procedures\Policy | Pages: | Page 4 of 11 |

8.0 WATER FITTINGS AND SYSTEM REQUIREMENTS

WGHC will ensure that all water fittings comply with relevant legislation and have the CE mark, British Standard kitemark or appropriate equivalent. Specialist advice will be obtained in the selection of all water systems fixtures and fittings. We will ensure that all water fittings are suitable for the purpose intended.

Hot water shall be stored in tanks at a temperature of at least **60°C** (degrees Celsius).

Water pipes shall be as short and direct as possible and pipes and tanks will be effectively insulated. Tanks will be protected against contamination and materials used which do not encourage Legionella growth.

Hot water shall reach taps at temperatures greater than **50°C within 1 minute of running**.

Cold water shall be stored at a temperature of less than 20°C. Cold water shall reach taps at temperatures less than **20°C within 2 minutes of running**. All little used outlets shall be routinely flushed through.

Where water is used or stored for consumption in any devices, e.g. water coolers, tea urns, drinks machines etc., an effective system of regular cleaning and disinfecting shall be introduced, in accordance with manufacturer's instructions.

9.0 DISINFECTION

Water services will be disinfected when any of the following situations occur:

- ❖ If a routine inspection or risk assessment shows it necessary to do so;
- ❖ After any prolonged shutdown of a month or longer (a risk assessment may indicate the need for cleaning after a period of less than one month, especially in summer where temperatures have been high);
- ❖ If the system or part of it has been substantially altered or entered for maintenance purposes in a manner that may lead to contamination;
- ❖ Following an outbreak or suspected outbreak of Legionaries' disease or any other water borne infection/disease.

10.0 VOID PROPERTY ACTIONS

It is recognised that all void properties have the potential to exhibit increased risk of Legionella due to the possibility of stagnant water remaining undisturbed within pipework for prolonged periods.

To mitigate the increased potential risk associated with voids, the contractor appointed to carry out repair and re-decoration works on all standard properties will carry out and record the following:

- ❖ Thoroughly flush all taps;
- ❖ Clean and disinfect, or replace, all shower heads;
- ❖ Inspect and report on water storage tank (where present).

All Special Lets becoming void will be assessed individually and on their own merits.

| | | | |
|------------------|---|---------------|---------------|
| Document Name: | Legionella and Water Management Policy | Version: | 1.0 |
| Created: | David Mills / WGHC | Version Date: | March 2023 |
| Owner: | David Mills / WGHC | Review Due: | February 2026 |
| Location / Path: | WGHC \ X:\Governance\Policies & Procedures\Policy | Pages: | Page 5 of 11 |

11.0 CONTRACTORS

A competent external contractor will be appointed to carry out legionella preventative monitoring and water hygiene services. As a minimum requirement, contractors are required to be a registered member of the Legionella Control Association (LCA) or the Water Management Society (WMSoc). Contracted works may include legionella sampling, tank inspections, water sampling, (for all bacteria) and other associated services, as identified in the Legionella Risk Assessment programme.

12.0 NOTIFICATION REQUIREMENTS

If it is suspected or confirmed that a tenant, employee or visitor has contracted Legionnaires' disease, WGHC will report the incident to the HSE under the Reporting or Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).

13.0 TENANT RESPONSIBILITIES

Tenants will be provided with information on good water management and Legionella control through the website and/or by means of information leaflets.

Tenants are advised to clean shower heads, descale and disinfect them at least every two months.

For showers that are only occasionally used, tenants are advised to flush the shower through by running the water for at least 2 minutes once a week.

Where a property is left vacant for any time (e.g. when on holiday), tenants are advised to flush both hot and cold water systems by running all outlets for at least 2 minutes.

Tenants should inform WGHC immediately if there are problems, debris or discolouration in the water.

14.0 IMPLEMENTATION AND REVIEW

The Chief Operating Officer is responsible for ensuring that their staff implement this procedure. The Maintenance Officers will ensure that this procedure is reviewed at least every 3 years.

Further information can be obtained here:

<https://www.hse.gov.uk/legionnaires/legionella-landlords-responsibilities.htm>

| | | | |
|------------------|---|---------------|---------------|
| Document Name: | Legionella and Water Management Policy | Version: | 1.0 |
| Created: | David Mills / WGHC | Version Date: | March 2023 |
| Owner: | David Mills / WGHC | Review Due: | February 2026 |
| Location / Path: | WGHC \ X:\Governance\Policies & Procedures\Policy | Pages: | Page 6 of 11 |

APPENDIX 1 = EXAMPLE LEGIONELLA RISK ASSESSMENT

Powered by **SafetyCulture**
safetyculture.com







Legionella Risk Assessment

7 Mar 2023 / David Mills

Complete

| Score | 7 / 12 (58.33%) | Flagged items | 1 | Actions | 0 |
|--|-----------------|---------------|---|---------|-------------------------------------|
| West Granton Housing Co-operative Ltd | | | | | <input checked="" type="checkbox"/> |
| Conducted on | | | | | 07.03.2023 |
| Prepared by | | | | | David Mills |

| | | | |
|------------------|---|---------------|---------------|
| Document Name: | Legionella and Water Management Policy | Version: | 1.0 |
| Created: | David Mills / WGHC | Version Date: | March 2023 |
| Owner: | David Mills / WGHC | Review Due: | February 2026 |
| Location / Path: | WGHC \ X:\Governance\Policies & Procedures\Policy | Pages: | Page 7 of 11 |

| | |
|--|---|
| Audit | 1 flagged, 6 / 11 (54.55%) |
| Legionella Risk Assessment | 1 / 2 (50%) |
| Is there any staff member or regular visitor particularly susceptible to legionella due to age, health or lifestyle? | No |
| Did the person carrying out the assessment have access to competent help and advice when carrying out the assessment? | Yes |
| Take a photo of the cold water system | |
|  <p>Photo 1</p> | |
| Provide a short description | |
| Cold water provided directly via mains supply. | |
| Take a photo of the hot water system | |
|    <p>Photo 2 Photo 3 Photo 4</p> | |
| Provide a short description | |
| Hot water provided by Vaillant combination boiler. | |
| Water Outlet Temperature | 2 / 2 (100%) |
| Is the cold water temperature at water outlets below 20° Celsius? | Yes |
| Temperature in Celsius: | 6°C Should be less than or equal to 20°C |
| Is the hot water temperature at water outlets above 50° Celsius? | Yes |
| Temperature in Celsius: | 62°C Should be greater than or equal to 50°C |
| Cold Water System | 1 / 1 (100%) |

| | | | |
|------------------|---|---------------|---------------|
| Document Name: | Legionella and Water Management Policy | Version: | 1.0 |
| Created: | David Mills / WGHC | Version Date: | March 2023 |
| Owner: | David Mills / WGHC | Review Due: | February 2026 |
| Location / Path: | WGHC \ X:\Governance\Policies & Procedures\Policy | Pages: | Page 8 of 11 |

| | |
|---|------------|
| Do you have any cold storage tanks | No |
| Hot Water System 2 / 3 (66.67%) | |
| Is the temperature setting on the boiler such that hot water is heated to a temperature of 60 ° celsius? | Yes |
| Are the hot water distribution pipes insulated? | Yes |
| Are there any hot water storage tanks or systems? | No |
| Showers and Shower heads | |
| Are there any showers in the property? | Yes |

Take photo of shower location(s) and the shower head(s)



Photo 5



Photo 6

| | |
|--|-----------------------|
| Dead Legs and/or Redundant Pipework | 1 flagged, 0 / 1 (0%) |
|--|-----------------------|

Sections of pipework which are redundant or owing to the system design and have little/no through the flow of water (known as 'dead legs') can allow water to stagnate in the system.

| | |
|---|-----------|
| Are there any dead legs on the property? | No |
| Unoccupied Periods 0 / 1 (0%) | |
| Is the building left unoccupied for a period of time in excess of 10 days? | No |
| Completion 0 / 1 (0%) | |
| Do you consider there to be any risks as a result of completing this assessment? | No |

Full Name and Signature of person undertaking risk assessment



David Mills
14.05.2024 14:53 BST

Full Name and Signature of Legionella Responsible Person

Les Graham

| | | | |
|------------------|--|---------------|---------------|
| Document Name: | Legionella and Water Management Policy | Version: | 1.0 |
| Created: | David Mills / WGHC | Version Date: | March 2023 |
| Owner: | David Mills / WGHC | Review Due: | February 2026 |
| Location / Path: | WGHC \X:\Governance\Policies & Procedures\Policy | Pages: | Page 9 of 11 |

Media summary



Photo 1



Photo 2



Photo 3



Photo 4

| | | | |
|------------------|--|---------------|---------------|
| Document Name: | Legionella and Water Management Policy | Version: | 1.0 |
| Created: | David Mills / WGHC | Version Date: | March 2023 |
| Owner: | David Mills / WGHC | Review Due: | February 2026 |
| Location / Path: | WGHC \X:\Governance\Policies & Procedures\Policy | Pages: | Page 10 of 11 |



Photo 5



Photo 6

| | | | |
|------------------|---|---------------|---------------|
| Document Name: | Legionella and Water Management Policy | Version: | 1.0 |
| Created: | David Mills / WGHC | Version Date: | March 2023 |
| Owner: | David Mills / WGHC | Review Due: | February 2026 |
| Location / Path: | WGHC \ X:\Governance\Policies & Procedures\Policy | Pages: | Page 11 of 11 |