

Legionella Policy and Procedure

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Signed off by: Health and Safety Committee

Date last reviewed:	30/05/2025	
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Policy consultation with:	Health and Safety Committee	
Legal Requirements:	Health and Safety at Work Act 1974 HSE - The Control of Legionella Bacteria in Water Systems; Approved Code of Practice and Guidance L8	
CQC:		
Other:	HSE Guidance - Controlling Legionella in Nursing & Residential Care Homes HSE Guidance - The Control of Legionellosis including Legionnaires Disease HMSO Publication - Health and Safety at Work etc Regulations 1999	
Related Policies:	Health and Safety Policy and Procedure	
	Reporting incidents and accidents policy and procedure.	
Scope: To ensure the safe and proper management of Water Hygiene across Outward's Stock. To ensure staff, visitor and residents are not exposed to the risk of legionella.		
Policy Equality Impact Assessed		

Version number	Amendments	Reviewed by	Date
01	New policy created	H&S Committee	29/05/2024

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1. Policy Statement

The aim of this document is to define a policy for the control and management of legionella bacteria in water systems within the dwellings owned and managed by Outward and the policy applies to both domestic and commercial properties. When visiting, working or living in and around Outward premises it is essential that the risk of exposure to legionella bacteria is minimised and controlled.

2. Purpose

This policy is intended to ensure that Outward meets the requirements of the HSE for The Control of Legionella Bacteria in Water Systems; Approved Code of Practice and Guidance L8. The policy also ensures that Outward meets the requirements of the Health and Safety at Work Act, which imposes a wider duty of care to employees, contractors and the public.

3. Responsibilities

The principal statutory requirements for the control and management of legionella bacteria is the Health & Safety Commission Approved Code of Practice and Guidance L8. The purpose of the regulation is to manage the risk from legionella to employees, residents and visitors to the Outward's premises and they require duty-holders to:

- Identify and assess the risks of legionella bacteria in water systems,
- Devise a scheme for eliminating or controlling the risk,

- Manage the risk, selection and training of competent personnel,
- Keep up to date records (electronically and log books on site),
- Manufacturers, suppliers, installers and users to address their responsibilities.

The above requirements will be met by the following actions:

- Inspection of water storage tanks (Six monthly),
- Visual inspection of the hot water calorifiers (Annually),
- Visual checks of temperatures and settings of calorifiers (Monthly),
- Temperatures of hot and cold water outlets at Sentinel taps (Monthly),
- Legionella water samples taken (Annually),
- Cleaning and disinfection of shower heads (Quarterly),
- Flushing of infrequently used outlets (Weekly),
- Checking other outlets on a rotational basis over a 12 month period recording temperatures in a log book and information be available for inspection.

The Health and Safety Executive produces the following guidance notes and other publications to give supplementary information/clarification, which Outward will follow where appropriate (within our own building and properties we manage on behalf of owning RP's):

- Controlling Legionella in Nursing & Residential Care Homes
- The Control of Legionella including Legionnaires Disease

The Assistant Director of Housing and Facilities has overall responsibility for the oversight and delivery of all aspects of Legionella Management Strategy. The Facilities and Business Support Officer along with staff from Outward's Housing Team will manage the day to day requirements set out in the Strategy. Staff within the both departments will be charged with individual roles and be made aware of their responsibility and receive appropriate training.

Outward will ensure we have an effective, robust and efficient system for the management of legionella. A fundamental part of which will be to ensure that persons at all levels charged with a responsibility will be competent to undertake the task.

Approved and suitably qualified external consultant/contractors are responsible for carrying out risk assessments on behalf of Outward. Risk assessments are carried out on all Outward/Newlon premises with communal areas and with any element of communal or shared water storage facilities outside of the dwellings.

The risk assessment results will determine the required remedial Bylaw 30 or chlorination work required. This work will be prioritised by the Head of Building Services in line with this strategy for Newlon managed stock or owning RP's.

Where properties have a residual risk they will be added to the ongoing water hygiene management programme. Newlon/Outward will employ legionella/ water treatment

contractors registered with and licensed by the HSE to carry out ongoing service and water quality monitoring programmes.

Where employees are required to work in areas not owned or controlled by Outward, this policy and its operational procedure will be used as a guide to safe working where there is a risk of exposure to legionella

4. Procedures

The Assistant Director of Housing and Facilities will be responsible for the day to day implementation of the operational procedures. Tasks will be appropriately delegated to members of the Housing and Facilities team. Management Team or to consultants or contractors. The duties and responsibilities include:

- Ensuring that all staff within the team are kept fully informed of developments in legislation and good practices relating to the management of legionella,
- Ensuring competent staff are employed in delivering the procedure,
- Ensuring that the 'Duty of Care' to our tenants, employees and contractors is robust,
- Ensure via appointed staff responsibility for the day to day delivery of the process and continuing audit.
- To ensure surveys are undertaken as and when this procedure dictates,
- That the Legionella register is kept up to date with additional or extra surveys as dictated by this procedure, where Outward do not have the responsibility of the register as we do not own the building. Copies of the surveys and works will be requested and held centrally
- Organising a practical prioritised programme of chlorination/Bylaw 30 works. Those areas offering the greatest risk will be treated first. Any new discoveries will either be added to the schedule or treated separately.
- Ensuring all programmed and development refurbishment works fall in line with this procedure where applicable,
- Carrying out training needs analysis with the Learning and Development Manager for the Housing Team and Facilities and Business Support Officer.

Risk assessments shall be undertaken of all water storage tanks, calorifiers and associated pipework, which are susceptible to colonisation by Legionella. The risk assessment shall follow the procedure L8 (2000) and the Approved Code of Practice for the prevention of Legionella. It should take into account the following:

- Temperature of stored water, e.g., tanks, calorifiers, water heaters with header tanks etc.
- Construction and dimensions of water storage tanks, calorifiers etc.
- Internal condition of water storage tanks and calorifiers (if possible)

- If tanks are Bylaw 30 compliant, e.g., screened overflows, insulation, lids
- Configuration of pipework to prevent water stagnation
- Dead legs in the pipework distribution system
- Condition of showers and showerheads
- Water temperatures at hot and cold outlets after specified running times
- Are drinking water labels installed to incoming mains
- Susceptible occupants, e.g., elderly, healthcare etc.
- Microbiological samples (TVC)

Total Viable Cell Counts (Dip Slides) will be taken during each risk assessment. If and when Legionella water samples are required, the contractor will obtain 2no. one litre water samples in a sterile container, one from the hot water distribution system and one from the cold water distribution system. The samples to be sent away to an independent UKAS accredited laboratory for analysis within 48 hours.

On completion the risk assessment should include identification and evaluation of potential sources of risk and the particular means by which exposure to legionella bacteria is to be prevented. Alternatively, if prevention is not reasonably practical, the particular means by which the risk from exposure to legionella bacteria is to be controlled.

Under guidance from the Approved Code of Practice (L8) it is important that the risk assessment is reviewed at least every two years and updated continually.

The completed risk assessment will make recommendations as to remedial works required to the domestic water system in order to comply with the Approved Code of Practice.

Examples of remedial works can include:

Replacement tanks required, Sterilisation/ Chlorination of system required,

Bylaw 30 works to be carried out, including:

- Insulation to pipework/ tanks
- Indicator labels to pipework
- Ball valve moved to opposite side of tank to allow crossflow of water
- Rodent screens to overflow pipes
- Lid vents to be fitted.

These recommendations are prioritised as high, medium or low with associated timescales as to when the work should be completed. These time scales are:

High Priority - Work to be carried out immediately. (Where this is not possible, regular disinfection and temperature monitoring regime to be adopted until period of rectification),

Medium Priority - Within three month,

Low Priority - Within twelve months

Water services shall be chlorinated/ sterilised for any of the following reasons:

- New installations before being taken into use to remove contamination which may have occurred during construction,
- If a routine inspection shows it necessary,
- If the system or part of it has been substantially altered for maintenance purposes in a manner that may lead to contamination,
- Following an outbreak or suspected outbreak of legionella or any other waterborne infection/ disease.

All chlorination work shall be carried out in accordance with BS6700 and all chlorination certificates should be added into the central database within 28 days of test being taken.

On completion of the risk assessment, a site log book shall be created. These will generally be kept electronically in a central database. Where appropriate a hard copy will also be kept on site. The site log book will contain the following information as a minimum:

Full site address,

Name of risk assessor and the company name,

Name of responsible person,

Date of assessment,

Schematic drawing of water storage tanks and associated pipework,

Photographic evidence of any pipework defects, condition of water tanks, calorifiers,

Details of microbiological sample results,

Detail of operation, relevant to controlling the risk,

Controls to be implemented complete with schedule.

Monitoring shall be carried out as prescribed by HSC L8 (2000). On completion of the risk assessment a monitoring regime will be set up in accordance with the recommendations of the assessment. Monitoring regimes will be recorded centrally in an electronic database and monitored by the Building Services Team in Newlon or partner landlords. Outward will have access to all central files. Actions and tasks will be recorded and monitored within a monitoring log for each block or building by the Landlord.

During monthly testing of water temperatures by Housing / staff site, if temperatures are not in line with set parameters then this is to be reported to the Building Services Team. A plumber/heating engineer should attend as an emergency job to ascertain the problem and carry out remedial works. Any other remedial works identified during quarterly, six monthly or annual inspections will fall into the time categories detailed in section 5.7.

Only specialist legionella/ water treatment contractors registered with and licensed by the Health and Safety Executive (HSE) will be permitted on stock. It is the landlords responsibility to carry out ongoing checking and auditing of the database and monitor risk assessments being carried out. After all risk assessments have been completed and the monitoring programme is established, the records shall be continually updated in accordance with the programme for the individual site and all information shall be kept in an accessible for auditing.

Responsibility for Legionella training rests with the Assistant Director of Housing and Facilities, who will ensure:

All those who potentially may have day-to-day contact with legionella will be fully trained to external industry standards, Those with management duties or those who are likely to be exposed to legionella are kept fully informed of new developments,

Training in all aspects of legionella management is cascaded to all levels of staff including Managers, Officers and other applicable staff

5. References/Further Reading

The Control of Legionella Bacteria in Water Systems: Approved Code of Practice & Guidance: L8

HSE Guidance - Controlling Legionella in Nursing & Residential Care Homes

HSE Guidance - The Control of Legionellosis including Legionnaires Disease

HMSO Publication - Health and Safety at Work etc Regulations 1999

6. General Data Protection Regulations Statement

Outward is committed to compliance with the General Data Protection Regulations and the Data Protection Act 2018. It requires all staff and partners to respect confidentiality and data subjects' rights in line with its policies and procedures.

To ensure compliance with the Regulations staff must ensure that any personal information digitally produced or processed as part of these procedures is appropriately filed within an approved relevant filing system with role-based access control.

Whilst processing paper documents, including those from third parties, these documents must be stored in secure lockable cabinets. Records will be kept for as long as they are needed to meet the operational needs of Outward, together with legal and regulatory

requirements. Where there is a deviation from this principle, the reasons for this must be recorded.

A detailed breakdown of retention and deletion of records can be found in Outward's Record Management and Retention Policy.

When disposing of documents containing personal data this should be done via confidential waste.

Please refer to Outward's Data Protection Policy and Procedure for more information.