



CRAIGOWEN

HOUSING ASSOCIATION

Legionella Policy & Procedures

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Version V4

WATER SAFETY / LEGIONELLA POLICY (2026) V4

1.0 INTRODUCTION

The following policy outlines Craigowen Housing Association's (the Association) practices and procedures for the management of water hygiene in relation to legionella.

To be compliant with the control of substances hazardous to health (COSHH) regulations as they apply to legionella, the Association has developed both risk management and risk control measures to ensure satisfactory processes and systems are in place to minimize the risk of legionella.

This document describes the process of risk management and minimum risk control measures for each type of premises and associated water systems and should be read in conjunction with the following: -

- Health & Safety at Work Order (NI) 1978 (as amended 1998)
- Management of Health & Safety at Work Regulations (NI) 2000 and subsequent amendments.
- Control of Substances Hazardous to Health Regulations (NI) 2003 as amended 2005
- CIBSE TM13 – Minimising the risk of Legionnaires' Disease
- Health & Safety Executive's Approved Code of Practice (ACOP) and Guidance (Fourth Edition, published 2013): Legionnaires Disease: The Control of Legionella Bacteria in Water Systems, commonly known and referred to as L8, HSG274 Parts 1, 2 & 3.
- HSG220 – Health & Safety in Care Homes (June 2014)
- HTM04-01 – Safe Water in Health Care Premises.
- BS8558 2015 – Design, Installation, Testing & Maintenance of services supplying water for domestic use within buildings and their curtilages.

2.0 POLICY STATEMENT FOR THE CONTROL OF LEGIONELLA BACTERIA IN WATER SYSTEMS

It is the written policy of Craigowen Housing Association (the Association) to do all that is reasonably practicable to protect residents, employees, visitors and neighbours from health hazards arising from the use and distribution of water in all Association owned or leased properties. This is achieved by the implementation of a risk management procedure to ensure full compliance with all statutory requirements of current relevant legislation, standards, codes of practice and published guidance.

The policy and guidance are reviewed and updated to take account of any changes in legislation or advances in risk control technology and industry practice.

The Association undertakes to perform the following actions:

- Appoint responsible persons and provide adequate training for Association employees.
- Identify all water plant and systems which present a potential risk of exposure to legionella bacteria.
- Reference will be made to HSG 274 Parts 1, 2 and 3 in connection with the pro-active monitoring and regular review of the assessment and control measures which are recommended, especially where the risk assessment is deemed no longer valid.

- Eliminate or reduce risks whenever possible by the procurement of plant, equipment and systems which have been designed to eliminate or control the risks of exposure to legionella bacteria.
- Establish and operate a written management process for controlling risks from legionella bacteria in all relevant properties.
- Monitor compliance with the management process and review risks and the performance of the risk control measures, revising risk assessments and management processes as required.
- Maintain comprehensive records for each property.
- Employ only competent, adequately qualified trained personnel and service providers.

3.0 RESPONSIBILITIES

In defining responsibilities, the Association will ensure that the “Responsible Person” has the competency and authority to manage the water systems and controls. Without this they will not be able to fulfil their role.

The Board of Trustees has overall responsibility for ensuring that the Association meets its legal obligations with respect to the control of legionella bacteria in building water systems. The Board of Trustees have budgetary control for the business and therefore have responsibilities as the nominated duty holder as defined under health & safety executive’s approved code of practice (ACOP) and guidance (Fourth Edition): legionnaires disease: The control of legionella bacteria in water systems.

The responsibility for the development and implementation of a risk control and management programme has been delegated to the Association’s management (Nominated Responsible Person).

The Association will engage the services of a water treatment specialist(s) to provide the necessary competent advice on policy and procedural matters, and to prepare legionella risk assessments, written control procedures and site documentation for legionella management and control.

4.0 LEGIONELLA BACTERIA & LEGIONNAIRES DISEASE

Legionnaires’ disease or legionellosis is a potentially fatal form of pneumonia. People may get infected when they breathe in tiny water droplets (aerosols) or droplet nuclei (particles left after the water has evaporated) contaminated with elevated concentrations of legionella bacteria.

Legionella bacteria grow best between temperatures of 20°C – 45°C, with optimum growth temperature being 35°C – 40°C. High temperatures (minimum 60°C) usually kill the bacteria.

Legionella bacteria are found in low numbers in natural aquatic environments, for instance, lakes, rivers and ground water. As a result, it is virtually impossible to prevent legionella bacteria entering man-made water systems.

In low numbers the bacteria are generally considered harmless. With the correct conditions, for example, warm water, the presence of micro-organisms and nutrients in the water or materials such as rust, these bacteria can grow and multiply to high levels which increase the risk of exposure.

The bacteria tend to grow in biofilms (slime). Biofilms are likely to form on surfaces where there is low water flow or water can stagnate. However, the growth of legionella bacteria can be controlled.

These conditions can develop in poorly maintained and operated cooling towers, evaporative condensers, showers, spray apparatus and hot and cold-water systems, which are the sources of most reported cases of legionnaires disease. 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). Water systems and services which are normally considered to present a foreseeable risk of exposure to legionella bacteria (as defined with ACOP L8) are listed below in descending order of risk:

- Cooling systems with cooling towers, evaporative condensers or dry/wet cooling systems.
- Hot & cold-water systems.
- Spa pools.
- Other plant and systems containing water can create and increase the risk from legionella during operation or when being maintained.

The above list is for guidance only and should not be taken as an exhaustive listing of water systems that present a foreseeable risk of exposure to legionella bacteria.

Legionnaires disease is a potentially fatal form of pneumonia caused by the inhalation of legionella bacteria. 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, persons more susceptible are normally in the age range of 50 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.

5.0 MINIMISING THE RISK FROM LEGIONELLA BACTERIA

It is generally accepted that levels of legionella bacteria found in typical mains supply waters 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 several 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.

Legionella bacteria start to die at a temperature above 50C with the temperature determining the speed this process occurs. Below 20C the legionella bacteria remains dormant.

However, within the temperature range of 20C to 45C legionella bacteria can proliferate rapidly giving rise to large numbers of the bacteria and increasing the likelihood of a high risk of exposure. Numbers can double every 2 to 12 hours. Within a few days, action levels can be reached.

In closed or sealed water systems even if legionella bacteria are found to be present at very high concentrations, under normal operation the risk present is low although where legionella is present the risk remains. The Association recognises that its duty is to minimise the legionella bacteria levels.

However, during cleaning or maintenance works where aerosols may be generated these same low risk systems could present an unacceptable level of exposure to operatives performing such work. In these circumstances, job specific risk assessments and method statements must be in place to cover such maintenance and / or cleaning procedures. 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.

6.0 LEGAL REQUIREMENTS

Legislation in the United Kingdom in relation to exposure to hazardous substances including biological agents such as legionella bacteria is contained within the control of substances hazardous to health (COSHH) regulations. Under the COSHH regulations the employer has a duty to ensure that health risks associated with hazardous substances including micro-organisms such as legionella bacteria are adequately controlled in the work-place by a process of risk assessment and management control.

Further legal requirements are described in the health & safety executive's approved code of practice (ACOP) and Guidance (Fourth Edition): legionnaires disease: The control of legionella bacteria in water systems (L8) which came into effect on the 25th November 2013.

Although failure to comply with any provision of the approved code of practice is not in itself an offence, failure may be taken by a court in criminal proceedings as proof that a person or organisation has contravened the legal requirement to which the provision relates. In such a case, however, it will be the person or organisation that must satisfy the court that compliance with the requirements has been achieved in some other way. The ACOP sets out guidance to satisfy the relevant legislative requirements under COSHH, which include:

- appoint a competent person for day-to-day management.
- Identification and assessment of risk.
- Preparation of a written scheme for prevention or controlling the risk.
- Management and the selection, training and competence of personnel.
- Record keeping.
- Responsibilities for designers, manufacturers, importers, suppliers and installers.

7.0 MONITORING AND TESTING

The extent of monitoring is determined through categorisation of premises and water systems together with the risk assessment process described within this document.

Where legionella monitoring is identified as a requirement it will be agreed between the Association's responsible person and their nominated water specialists.

8.0 PROPERTY CATEGORISATION

The Association has worked closely with our nominated supply chain water specialist partners Healthy Building Environment (HBE) to determine the correct policy and processes for use with the various water system types and sizes installed within the property portfolio. This policy adopted is not a one size fits all approach as the risks associated with mains supplied water systems are negligible compared with that of large stored water systems. Although this is dependent upon how the water system is designed, maintained and managed.

The Association has undertaken a review of the water system types contained throughout our property portfolio with our appointed specialist (HBE) and have compiled a list of minimum monitoring requirements for legionella control in each of the different types of premises according to water system type. These are broadly categorised by property size and type.

As part of ongoing monitoring the Association will annually review the management information as it recognises that resident's individual needs will also play a part in the assessing the risk of legionella, and potentially the monitoring requirement.

The minimum monitoring requirements for the Associations portfolio of stock are detailed in the HBE contract and Bluezone Legionella Management Dashboard, together with a full property list including categorisation.

The actual level of risk will be dependent on several factors including system design, operation, condition, maintenance and susceptibility of building occupants. It is important to establish the written control scheme and any requirements for remedial measures such as cleaning and disinfection, equipment removal or replacement.

9.0 IDENTIFICATION & ASSESSMENT OF THE RISK FROM LEGIONELLA BACTERIA

The Association will engage the services of a supply chain nominated water specialist (HBE) to have responsibility for completing site surveys, risk assessments and for the preparation of site specific written control schemes, record system and programme of maintenance and monitoring for each property allocated to them by the Association.

In carrying out the initial assessment of potential risk of exposure to legionella bacteria, it is essential to take account of the main factors affecting that said risk, as detailed below:

- The potential for legionella bacteria to colonise, survive and proliferate in the water system under normal operating conditions, for example, is the water temperature between 20C and 45C or is there debris in the system such as rust deposits, sludge or scale.
- The potential for water to stagnate including over-capacity and dead leg area, for example, capped pipe work or vacant areas of the property no longer used.
- Infrequently used outlets such as showers, taps, etc.
- The potential for aerosol generation during normal operation, and when maintenance work is undertaken.
- The potential for exposure of persons to aerosols containing viable legionella bacteria.

It is essential that all sites are assessed adequately to ensure that the most appropriate provisions are made to comply with current legislation. This must include the whole property, including resident areas that do not have separate water facilities, or supply from the local water supply company, or where the Association is responsible for building water services.

The risk assessment shall be reviewed as described in section 2.0 of this document or when changes occur (as indicated in section 2.0). Where the system is unchanged, the existing documentation shall remain, but the review date and signature of reviewer must be entered onto the review sheet contained within the risk assessment document. A completed copy of the risk assessment and written control scheme shall be located within the Bluezone Legionella Management Dashboard supplied by the nominated water specialist who completed the assessment.

10.0 RISK CONTROL & WRITTEN CONTROL PROCEDURES

When deciding on control measures appropriate to deal with risk allocation, the following list should be considered in the order given:

- The elimination of the hazard at source, for example, a direct main- supplied point of use system.
- The reduction of the hazard at source, for example, large water systems, spray apparatus and dead-legs.
- The reduction of the exposure to the hazard, for example, system checks, temperature monitoring and flushing of infrequently used outlets.

Process, control measures and policy, must be reviewed on a regular basis and revised as required. Similarly, if conditions change to the extent that any risk identified is significantly affected then the risk evaluation and management process shall be reviewed.

Written control procedures shall be provided for controlling the risks identified by the risk assessment considering the minimum monitoring requirements detailed in the MBR360 web portal & L8 file. The written control procedure shall clearly identify the specific actions required, their frequency and the nominated person responsible for the undertaking of such actions.

In controlling the risk of exposure to legionella bacteria within “at risk” building water systems, attention must be paid to the following:

- The control and reduction of aerosol emissions.
- The control of legionella bacteria proliferation by the application of a suitable water management programme including cleaning and disinfection, temperature control and if required, water treatment, plant and equipment checks, and routine maintenance to ensure compliance with recommendations given in HSG 274 Parts 1, 2 and 3.
- The monitoring of the performance of the water management programme.
- The effective communication, training and documentation for the operation and maintenance of the water system(s). Additional checks and auditing should also be undertaken to ensure the adequacy of preventative actions for controlling the associated risks.

11.0 TRAINING

The Association will engage the services of a nominated supply chain water specialist to carry out legionella risk assessments and implement written control measures. As a minimum they must be adequately trained and competent to undertake such tasks and be suitably qualified and be independent of any of the parties carrying out the controls and the testing.

The specialist will ensure that any personnel/persons involved in the management and implementation of the risk control programme are trained and competent in the duties they are required to undertake. Nominated water specialist will provide specific training in legionella awareness and management, together with the risk management process detailed in this document. The specialist will also provide support to scheme managers and/or employees to ensure that they understand the risk management process and their role in its successful implementation.

Where the specialists staff undertake any risk assessments they must have completed training comprising of both in-house training by the specialists nominated person, combined with external accredited training by a recognised professional body. Copies of training records and a copy of the company training policy for staff employed in the control of legionella are available upon request from HBE International.

12.0 WATER MANAGEMENT PROGRAMME

The risk assessment programme will be routinely reviewed by nominated responsible person. On the completion of each risk assessment, any recommendations will be actioned by the appropriate maintenance officer. Any serious non-compliance identified during the survey visits will be communicated to the nominated responsible person and a suitable course of action will be agreed.

Routine system monitoring of temperature and flushing will be carried out using local resources. Where more specialised services are required, such as cleaning and disinfection, these will be procured by the Association.

Future water quality monitoring requirements will be co-ordinated by responsible person and will involve the services of a nominated water specialist. Risk assessments will be reviewed in line with section 2.0 above and more frequently if changes occur to building water services and / or occupancy in accordance with ACOP L8 guidance.

13.0 DOCUMENTATION & RECORDS

The HSE approved code of practice and guidance requires that detailed records are to be kept. It is essential that records are organised in a structured format and reflect the key management processes to demonstrate compliance with the relevant statutory requirements and Association requirements as set out in this document.

Relevant information shall be compiled and maintained by the responsible person to ensure that procedures and records reflect the water systems identified in the risk evaluation process. The responsible person will assign the tasks to ensure compliance with the risk management programme.

All relevant documentation in relation to the management of legionella is available through the HBE Bluezone Legionella Management Dashboard. This is constantly updated to include the most up to date records.

It is the duty of the Association, and its employees and agents to ensure that organisations and personnel employed are competent, suitably trained and have the necessary equipment to undertake their duties under the written control procedures, adequately and safely.

Water Treatment

All water treatment chemicals and equipment should be used in accordance with the manufacturer's instructions. Chemicals should be dosed to achieve stated concentrations and amounts of chemical used and recorded.

ALL RECORDS WILL BE KEPT FOR A MINIMUM OF FIVE YEARS

14.0 MAINTENANCE

The Association will regularly seek guidance from its nominated water specialist on the current best practice for regular maintenance of all its water systems. This will include:

- Cold water storage tanks;
- Water heaters and/or calorifiers;
- Showers;
- details of commissioning and de-commissioning procedures;
- pre-let inspections.

This list is not exhaustive, and the risk assessment will identify any potential areas that require additional maintenance.

Design philosophy for upgrading and provision of new installations:

Water services that are directly fed from the incoming mains supply present reduced risk to building occupants, so when contemplating new or refurbishment projects that involve work to the water services; this shall be the preferred solution. In all other circumstances, systems shall be changed from stored, to mains-supplied, as opportunities arise for an upgrade.

When completing upgrade work, water services must comply with British Standards and water supply regulations. Any changes made to site water systems must be documented within the site record system and where appropriate, the risk assessment and schematic drawings must be amended accordingly.

The key points to consider when refurbishing or installing new water systems are:

- Keep systems simple.
- Restrict microbiological growth by keeping temperatures below 20C.
- Remove disused systems and dead legs.
- Use low capacity local area water heaters.
- Insulate pipe work.
- Run all systems from the direct mains supply.
- Where showers are required, consider the use of electric point of use units.
- Label all outlets including drinking water.
- Document all installations on a schematic drawing.

15.0 REVIEW

This Policy shall be audited every three years as part of the health and safety audit system and subject to review when applicable to any change in regulations or relevant legislation.

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