



C & C HOUSING GROUP

LEGIONELLA MANAGEMENT POLICY

Approver	Board of Management
Policy	Legionella Management Policy
Date last revised	October 2019
Revised by	Head of Property Compliance
Next Revision Date	October 2022
Related Documents	C&C Legionella Management Procedures

Signed:

**Julia Ashley
Chief Executive**

On Behalf of the Board Management

1. INTRODUCTION

- 1.1 The Central & Cecil Housing Group (C&C) is committed to provide and maintain safe and healthy working conditions, equipment and systems for all staff, residents and visitors and to provide such resources, information, instruction, training and supervision as may be needed for this purpose
- 1.2 C&C has a number of dwellings and properties that it owns/manages with water services arrangements, which need to be assessed and managed to prevent the risk of legionella and associated bacteria. This includes various types of tenure such as care, supported, sheltered and general needs properties.
- 1.3 Water hygiene (legionella) arrangements are managed by C&C's Property Compliance and Asset Management Department.
- 1.4 This Policy will be reviewed on a three-yearly basis unless any legislative changes require an earlier review.

2. PURPOSE

- 2.1 Where C&C has water services in properties/dwellings that it owns/manages then it has a responsibility to ensure that the necessary measures have been taken to protect the health and safety of its employees, tenants and residents, visitors to the properties/dwellings and service providers undertaking works in the properties/dwellings. This shall be delivered through:
 - Ensuring that suitable and sufficient risk assessments have been completed and necessary measures implemented to mitigate risks.
 - Having suitable management systems in place including record keeping.
 - Having competent persons appointed to manage and administer the systems and measures in place.
 - Providing suitable training to employees responsible for the service.

3. SCOPE

- 3.1 This Policy applies to all employees, volunteers and Board and Committee members. It also applies to those employed by agencies under agreements with C&C. All of these will be referred to as “worker” in this Policy.
- 3.2 Failure by any worker to comply with this Policy may lead to disciplinary action being taken against them. Any disciplinary action will be dealt with in accordance with the Disciplinary Policy.
- 3.3 This document applies to all C&C owned, leased and managed stock.

4. RESPONSIBILITIES

- 4.1 The Chief Executive of C&C has ultimate responsibility for compliance towards Health and Safety at Work Act 1974 and other regulations as set out and described below. These are delegated throughout the company to ensure day to day activities are carried out
- 4.2 The Health, Safety and Fire Steering Group manage these delegated responsibilities and meet quarterly.
- 4.3 A monthly FLAGE report is provided to the Executive Management Team setting out compliance information relating to water safety management.
- 4.4 The Board of Management will receive a report on performance for all FLAGE metrics as part of the reporting process. This report is generated by the Head of Property Compliance.

5. POLICY

- 5.1 C&C’s policy for Water Hygiene is as follows:
 - To comply with all relevant statutory requirements relating to water management.
 - To appoint/instruct a suitably qualified contractor to undertake site specific L8 water services risk assessments (WRA) for all properties/blocks which have communally stored hot and/or cold-water services and also dwellings which have certain types of individually stored water services where occupied by more vulnerable persons.
 - To identify from the L8 water service risk assessments where ongoing water hygiene monitoring regimes are required and to implement these utilising both suitable qualified contractors and in-house staff who have had appropriate training.
 - To have a planned programme for capital/major works such tank replacements, based on life expectancy and condition appraisal.

- To have in place a generic water services risk assessment for individual dwellings.
- To undertake a review at least every 2 years of the L8 water services risk assessments completed.
- To maintain a record of properties/blocks, which have been assessed and do not require an L8 water services risk assessment or ongoing water hygiene monitoring due to their being no communally stored water services and a low risk tenure type.
- To undertake management of these arrangements utilising the frameworks set out in the associated procedures.

6. SUPPORTING DOCUMENTS

6.1 Key Health & Safety statutory requirements are contained within:

- The Health and Safety at Work Act 1974
- Management of Health and Safety Regulations 1999.
- Control of Substances Hazardous to Health Regulations (COSHH) 2002
- The Water Regulations 2002.
- Water Industry Act 1991
- Water Supply (Water Quality Regulations) 2000
- Water Supply (Water Fittings) Regulations 1999
- The Construction (Design and Management) Regulations 2015
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 1995.
- Notification of Cooling Towers and Evaporative Condensers Regulations 1992
- Safety Representative and Safety Committee Regulations 1977
- The Health and Safety (Consultation with Employees) Regulations 1996

6.2 Key guidance is included within:

- Health and Safety Commission, Approved Code of Practice and Guidance – Legionnaires Disease – the control of legionella bacteria in water systems (L8)- 4th Edition 2013.
- HSE document HSG274 Part II: 2014 The Control of Legionella bacteria in hot and cold-water systems.

- BS 8558:2011 – A Guide to the design, installation, testing and maintenance of services supply water for domestic use within buildings and their curtilages.
- BS 8580: 2010 – Water Quality- Risk Assessments for Legionella control – code of practice.
- CIBSE Technical Guidance TM13: 2013 minimising the risk of Legionnaire’s disease.

The requirements and guidance of the documents listed above are included, as appropriate in the policy and procedures.