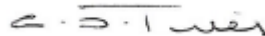



LONDON HOMES
SINCE 1926
LEGIONELLA POLICY

Approver	Board of Management
Date Approved	
Policy	Legionella Policy
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Issued by	Head of Property Services
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Related Documents	Legionella Management Plan
Location of Hard Copy	Property Services Department

Signed:

Chief Executive



Caroline Tiller
On Behalf of the Board of Management

Policy – Legionella Policy
Issue Date – 26 March 2014
Issued by: James Warne

1.0 Introduction

- 1.1 C&C's first priority is to ensure the safety of its resident's and their visitors, staff, and contractors. We aim to do this by following the requirements and guidelines of the prevailing legislation and codes of practice in the area of Legionella control and water treatments.
- 1.2 A fact sheet giving background information is appended for reference and information- Appendix 1LP

2.0 Policy Aims

- 2.1 The purpose of this document is to set out in a clear and precise manner C&C's policy on managing Legionella & Legionnaires' disease within its premises as part of its duties under the Health & Safety at Work Act (HSAW) 1974.
- 2.2 The main aim is to reduce the risk of potential Legionellosis within C&Cs property portfolio in order to prevent occupants being exposed to Legionella bacteria.

3.0 Policy Details

- 3.1 C&C acknowledges the health hazards associated with exposure to legionella and will protect those persons potentially exposed to legionella as far as is reasonably practicable by minimising exposure through the use of proper control measures and work methods.
- 3.2 C&C has implemented and operates this policy in order to ensure compliance with the Health & Safety at Work Act (HSAW) 1974.
- 3.3 This Policy details the process in which water systems will be managed by C&C staff, contractors and applies to all properties owned and/or managed by C&C. The policy is intended to ensure that C&C provide 'safe housing conditions' and a "safe working environment' for staff and contractors.
- 3.4 The policy has been developed to ensure C&C meet their statutory obligations required by law. This policy should be read in conjunction with the Legionella Management Plan.
- 3.5 C&C accepts its responsibilities under the following regulations:
 - Health & Safety at Work Act (HSAW) 1974, the Management of Health & Safety regulations (MHSWR) 1999, and the Control of Substances Hazardous to Health regulations (COSHH) 1999. Legislation and guidance is contained in a single document, the Approved Code of Practice and Guidance L8-“ Legionnaires' disease; the control of Legionella bacteria in water”.

The policy conforms with the requirements of the following legislation;

- Health and Safety at Work Act 1974
- Management of Health & Safety regulations (MHSWR) 1999
- Control of Substances Hazardous to Health regulations (COSHH) 1999
- Approved Code of Practice and Guidance L8-“ Legionnaires' disease; The control of Legionella bacteria in water”.

4.0 Performance Monitoring

4.1 The following will be monitored and reported to C&C's Executive Management Team on a quarterly basis as follows;

- The number of buildings/ dwelling units where Legionella Risk Assessment is required to be undertaken
- The number of properties where Risk Assessment has been completed
- The number of properties where remedial works have been identified
- The number of properties where remedial works have been completed
- The total number of Actions arising from the Risk Assessment
- The total number of Actions which remain outstanding
- The number of properties which have a low/medium and high risk rating (equals the total required to be undertaken – needs to show month by month figures to track completion)
- Any comments concerning residual risks that cannot be removed.

5.0 Procedure

5.1 The procedures for the implementation of this Policy are contained within the Legionella Management Plan.

5.2 The Legionella Management Plan will;

- Take reasonable steps to identify and locate all potential exposure risks.
- Maintain written/electronic records of all Legionella assessments carried out.
- Monitor all water systems
- Ensure that all remedial measures are carried out.
- Ensure that the policy covers all persons likely to be at risk and include customers/visitors, staff and contractors.
- C&C endeavours to ensure that managers, staff and contractors and their representatives are kept fully informed of all matters associated with legionella.
- Make provisions for the management of residual risks that cannot be removed.

Appendix 1LP - Fact Sheet

Background Information regarding Legionellosis and the Legionella Bacteria.

- Legionellosis is the collective name given to respiratory illnesses caused by legionella bacteria, the most serious is Legionnaires disease, a type of pneumonia. Similar but less serious illnesses include Pontiac fever and Lochgoilhead fever. The disease first came to prominence in July 1976 following an outbreak of and a typical pneumonia among the delegates of the 1976 Legionnaires convention in Philadelphia. 221 people developed symptoms and of these, 34 died. The syndrome became known as “Legionnaires’ disease”, and was at first thought to be caused by a virus, a commonly held misconception that is still reported in most newspapers following outbreaks.
- Legionnaires’ disease is a relatively recently discovered condition, but Legionella have probably been present and unrecognised in the natural environment for an unknown period and it was only when they interacted with the built environment in such a catastrophic way that they had any recognised impact on human activities.
- The organism occurs widely in nature where it exists in soil, streams, lakes and rivers and other fresh surface waters. It does not grow actively at temperatures below 20 C, but can remain dormant for many months, surviving in ice. It is rapidly killed at temperatures above 60 C. Its favoured growth range is between 32 and 41 C and it has a nutritional requirement for iron and for cysteine. Growth is slow compared to many other water borne pathogenic bacteria such as E. coli or the salmonellae.
- Legionellae are also resistant to short term acid exposure down to pH 2.
- Bacteria exist in water in two principal forms: planktonic (free living), and sessile, (attached to surfaces). Research has shown that the sessile mode is preferred in natural and in reasonably clean built water systems (ie, having low levels of nutrients), with typically only 0.1% being present in the planktonic form (Geesey et al, 1978). This is a significant finding as it implies that a degree of caution should be taken on interpreting the counts obtained for Legionella in domestic water systems. It is the view of both AEC and the HSC that random sampling for Legionella in water systems is not recommended, but that selective Legionella sampling can be beneficial as part of a management plan in a high risk system, to demonstrate the effectiveness of an existing control strategy. Legionella monitoring is a requirement in the management of cooling towers and evaporative condensers.
- Legionella are known to be ingested by protozoae such as amoebae, where they exist in a vacuole or cyst within the amoeba, evading digestion and are thus protected from environmental difficulties. This is a major factor in the survival of the bacteria. The cysts are very hardy, remaining intact following the death of the amoebae. They can sometimes re-seed water systems following cleaning and disinfection.

Equality Impact Assessment – initial screening exercise

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Legionella Policy

Relevant Equality Area	Does the policy or its implementation:		Does CCHT need to proceed to full Equality Impact Assessment (If in doubt then progress to full screening)
	Breach equalities legislation ?	Affect different groups in different ways (both positive and negative)	
Gender	No	No	No
Race	No	No	No
Disability	No	No	No
Age	No	No	No
Sexual orientation	No	No	No
Religion and beliefs	No	No	No