



Legionella Management Policy

July 2024

Lead officer	Mark Jones – Director of Property Services
Author	Asset Team
Version number	1
Date agreed	23 July 2024
Agreed by	Operations Committee
Review date	3 years from approval date
Diversity compliant	Yes
Equality Impact Assessment required	No
Data Protection compliant	Yes
Health and Safety compliant	Yes

Contents

Item		Page
1.	What this policy is about and why we need it	3
2.	Who does this policy apply to	3
3.	Our policy is • Objectives • Responsibilities	3
4.	How we will monitor this policy	6
5.	Equality & Diversity	6
6.	Data Protection	6
7.	Procedures and other documents that link to this policy	7
8.	Links to other policies	7
9.	Legislation	7
10.	When this policy will be reviewed	7
11.	Jargon Buster	8
12.	Appendices	8

1. What this policy is about and why we need it

The overall aim of this policy, and the associated management plans and procedures and control documents is to ensure the safety from infection from water systems and installations. This policy focuses on the main occupational safety risk for people living and working in properties, owned or managed by Acis Group Limited (AGL) which arises from Legionella bacteria.

AGL aims to protect the occupiers of its properties, as well as other residents, visitors, staff, contractors, and the public, from the risks associated with water systems so far as is reasonably practicable.

This document sets out key policy objectives, control measures and accountabilities for reducing risk from water supply and installation systems.

This purpose of this policy is to ensure AGL meets its obligations under the relevant legislation.

The application of this Policy ensures that AGL meets compliance with the outcomes of the Regulatory Framework for Social Housing in England introduced by the Regulator of Social Housing as outlined below:

(Registered Providers must) meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes

2. Who does this policy apply to?

This policy applies to all properties owned or managed by AGL

3. Our policy

3.1 Objectives

The key objective of this policy is to ensure that AGL meets its statutory responsibilities. To help to deliver this, we will:

- Appoint persons with clear roles and responsibilities to manage the risks associated with Legionellosis.
- Only use suitably qualified contractors and consultants that can show accreditation to the Legionella Control Association (LCA)
- Develop and maintain a Register that contains all the assets that AGL is responsible for and record within it all activities associated with the control of legionella, retaining records for at least 5 years.

- Carry out a desk-based exercise to identify those buildings where conditions may be present that encourage legionella bacteria to multiply and/or disperse and assign the appropriate risk classification to these assets as defined in the Legionella Management Plan. This will include blocks and common areas within larger buildings, along with domestic properties.
- Carry out Legionella Risk Assessments (LRAs) which comply with ACoP L8 and BS 8580 on the assets where required as defined in the Legionella Management Plan to identify and resolve hazards relating to risk of infection.
- Where the outcomes from an LRA identifies a reasonably foreseeable risk, modify any deficient systems and equipment, and compile a Written Scheme (including an accurate schematic diagram of the system) and arrange the necessary programme of routine inspection, management and testing of water systems.
- Develop and maintain a Legionella Management Plan for the portfolio.
- Ensure that for dwellings left vacant for extended periods of time, a suitable drain-down or flushing regime is put in place in accordance with the AGL Lettable Standard to prevent the potential build-up of risk conditions.
- Act appropriately and in accordance with regulatory and legal requirements to ensure that we access relevant premises to undertake all necessary inspection, testing and maintenance interventions as defined by the Written Scheme.
- Ensure that Legionella risk information is provided to customers and stakeholders.
- Annually review the job profiles, skills, knowledge, and experience of those staff involved in the delivery of this policy and, where necessary, provide training so that they are able to deliver their responsibilities.
- Ensure that any unauthorised and defective alterations or additions to water installations are made safe.

3.2 Responsibilities

The table below identifies key responsibilities

Role/ Responsibility
The Chief Executive is the named Duty-holder as required in ACOP L8 and has overall <u>accountability</u> for this policy.
The Director of Property Services is <u>responsible</u> for: • Ensuring that adequate resources are made available to enable the key policy objectives and targets of the policy are met And is <u>accountable</u> for: • Overall policy implementation

Ensuring any dangerous occurrences involving water hygiene are investigated and where instances are RIDDOR reportable, and take appropriate actions.
The Head of Property Development & Assets is <u>responsible</u> for: - Overall policy implementation And is <u>accountable</u> for: - Achieving the key policy objectives and targets identified in this Policy, including the designing and implementing of associated procedures, staff training, and communication to customers. - Ensuring any dangerous occurrences involving Legionella are investigated
The Property Data and Compliance Manager is the 'Responsible Person' as defined in ACOP L8 and is <u>responsible</u> for: - Achieving the key policy objectives and targets as set out in this Policy - Managing a programme of internal and external audits which will check that the policy and procedure is being followed - Reporting assurance to Board And is <u>accountable</u> for - Ensuring the Registers are up to date and accurate - Ensuring contractors carry out identified routine maintenance and remedial works - Ensuring AGL staff carry out the routine compliance tests and inspections as determined by the 'written schemes' - Ensuring that the reports and data used to measure compliance are accurate
The Asset Compliance Officer is the 'Deputy Responsible Person' as defined in ACOP L8 and is <u>responsible</u> for: - Ensuring contractors carry out the routine maintenance and remedial works - Ensuring AGL staff carry out the routine compliance tests and inspections as determined by the 'written schemes'
The Asset Administrator is <u>responsible</u> for: - Ensuring the Register is maintained, accurate and up to date - Co-ordinating access into properties to carry out legionella risk assessments and inspections.
Neighbourhoods staff are <u>responsible</u> for - Supporting the Asset Team and contractors in gaining access to carry out legionella related works and maintenance. - Carrying out any specific tasks, management and monitoring assigned to them.
Acis Repairs teams are <u>responsible</u> for: - Remove any visible dead-legs during routine and planned maintenance - Undertake any specific tasks, management and monitoring assigned to them.
The Health and Safety Manager is <u>responsible</u> for: Ensuring any dangerous occurrences are investigated and where instances are RIDDOR reportable take appropriate actions
The Development Team are <u>responsible</u> for: Arranging for Legionella risk assessments to be undertaken at all new schemes

• Working with the Asset Team to ensure that relevant documentation is produced and processed
All Employees & Contractors have the <u>responsibility</u> to: • Abide by all information and training provided and promptly report any incidents regarding Legionella.

4. How we will monitor this policy

This policy will be subject to external technical review and internal approval every 3 years for accuracy and appropriateness or sooner where any legislative changes or requirements dictate.

Operational performance will be monitored and reported every month by the Asset Team and the following information will be reported to the Operations Committee every quarter:

- % of block and communal areas with a valid Legionella Risk Assessment

In addition, where customers have used the services covered by this policy and wish to provide feedback, including suggested improvements, these will be collated and used at the time of the review.

5. Equality & Diversity

AGL is committed as an employer and provider of housing services to equality of opportunity for all. In addition to this statutory duty under the Equality Act 2010, it is further committed to developing a culture, which recognises wider social diversity in its communities and therefore respects and recognises the values and needs of individuals regardless of whether they belong to a particular section of society or group provided for by legislation.

The group will work with minority and vulnerable groups, support groups, resident forums and external agencies to ensure they contribute to policy and service development.

All customers will have access to this document upon request.

This document can be translated or provided in alternative formats (e.g. large print, Braille, audio) upon request.

Equality and Diversity awareness training is mandatory for all staff.

Contractors delivering the service will be expected to follow AGL' Equality and Diversity Policy.

6. Data Protection

All parties referred to in this policy must abide by the 6 principles of the General Data Protection Regulations as detailed below:

- Lawfulness, fairness, and transparency
- Purpose limitations
- Data minimisation
- Accuracy
- Storage limitations
- Integrity and confidentiality

7. Procedures and other documents that link into this policy

The following procedures link to this policy

- Appendix A – Legionella Management Plan

8. Links to other policies,

Other policies and strategies that link into this policy are:

- Asset Management Strategy
- Lettable Standard
- Void Standard
- Repairs and Maintenance Strategy
- Health & Safety Policy
- Asbestos Policy
- Equality & Diversity Policy

9. Legislation

In developing this policy, information, guidance and references have been taken from the following:

- The Health and Safety at Work etc. Act 1974.
- The Management of Health and Safety at Work Regulations 1999
- Control of Substances Hazardous to Health (COSHH) Regulations (as amended) 2002
- The Housing Act 2004 which introduced the Housing Health and Safety Rating System (HHSRS) and the Housing Health and Safety Rating System Regulations 2005.
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- The Water Supply (Water Fittings) Regulations 1999 S I 1999
- The Water Supply (Water Fittings) (Amendments) Regulations 1999.

and the following Approved Codes of Practice (ACoP) and guidance:

- Approved Code of Practice (ACoP) L8 – ‘Legionnaires Disease: The Control of Legionella Bacteria in Water Systems’ Approved Code of Practice.

- HSG 274 Part 2 Hot & Cold-Water Systems
- HSG274 Part 3 the control of legionella bacteria in other risk systems

10. When this policy will be reviewed

This policy will be reviewed every 3 years or in the event of a change in regulations.

11. Jargon buster

Reference	Definition
Legionella/ Legionellosis	Legionellosis is a collective term for diseases caused by legionella bacteria including the most serious Legionnaires' disease, as well as the similar but less serious conditions of Pontiac fever and Lochgoilhead fever. Legionnaires' disease is a potentially fatal form of pneumonia and everyone is susceptible to infection. The risk increases with age but some people are at higher risk including: • people over 45 years of age • smokers and heavy drinkers • people suffering from chronic respiratory or kidney disease • diabetes, lung and heart disease • anyone with an impaired immune system
ACoP	An Approved Code of Practice describes the recommended methods that should be used (or standards to be met) to comply with Health and Safety legislation

12. Appendices

Appendix A – Legionella Management Plan