

CROYDON COUNCIL HOUSING

Water Hygiene and Legionella Policy

This policy sets out the Council's approach to managing water hygiene systems and legionella within its domestic housing stock.

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1. Purpose

- 1.1. This policy sets out the Council's approach to managing water systems within its domestic housing stock. The Council will ensure that there is an effective system for the inspection, maintenance, and management of all water systems within the buildings it controls, such as community centres.

2. Statement of intent

2.1. The Council will:

- Identify and assess sources of risk, e.g., where conditions are present that may encourage legionella bacteria to multiply or where there is a means of creating and disseminating breathable droplets and establish any items of non-compliance.
- Implement, manage, and monitor identified control measures through water risk assessments.
- Prepare management servicing contracts and programmes for the remediation, prevention, and control of identified risks.
- Ensure that suitable and sufficient resources are available to manage the risks.
- Appoint a responsible person and deputy who will put in place an action plan to minimise the risk of legionella and to manage and monitor the necessary work systems and procedures.
- Implement, amend, and monitor precautions for all relevant systems and maintain records of maintenance, inspection, and testing for a period of at least five years.
- Keep all relevant personnel adequately trained in practices and procedures with respect to the control of Legionella, including Voids Inspectors, Repairs Inspectors and Tenancy Managers.

3. Scope

- 3.1. Properties managed and owned by the Council. The Council has responsibility for water systems in:

- General needs residential blocks
- Sheltered accommodation
- Extra care homes
- Hostels
- Street properties
- Special lets, HMOs.

- Community centres
- 3.2. Whenever water is stored or used in such a way that may create a foreseeable risk of legionellosis and particularly to the following water systems:
- Hot and cold-water services and tanks.
 - Other plant and systems containing water which is likely to exceed 20⁰ C, and which may release a spray or aerosol during operation or maintenance.
 - Any other services that contain and hold water.
- 3.3. To council employees, contractors, tenants, and other persons or other partners who may work on, occupy, visit, or use its premises.

4. Legal references and standards

- The Health and Safety at Work Act 1974
- The Management of Health and Safety at Work Regulations 1999
- Approved Code of Practice (ACOP) L8 – “Legionnaires Disease: The Control of Legionella Bacteria in Water Systems” - Approved Code of Practice (ACoP)
- Legionnaires’ disease: Part 2: The control of legionella bacteria in hot and cold-water systems: HSG274 Part 2 Published 2014
- INDG 458 Legionnaires Disease – A Brief Guide for Duty Holders (2012)
- British Standards 8580:2010 – Water Quality: Risk Assessment for Legionella
- The Water Supply (Water Fittings) Regulations 1999 S I 1999 No 1148. (As amended)
- BS6700: 2006 Specification for Design Installation, Testing and Maintenance of Services Supplying Water for Domestic Use within Buildings and their Curtilages.
- BS7942: 2000 Thermostatic Mixing Valves for use in Care Establishments.
- HSG Health and Safety in Residential Care Homes (2001)
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

5. Related documents and processes

- Checklist for hot and cold-water systems (HSE)
- Action levels following Legionella sampling in hot and cold-water systems (HSE)
- Action to take if there is an outbreak.

- Simple control measures that can help manage the risk exposure to Legionella.

6. Definition of terms

6.1 Duty holder - The individual, organisation, or body with ultimate responsibility for safe operation of the water systems within the premises.

6.2 Responsible person - Individual appointed to have responsibility under the authority of the Duty Holder for ensuring that: the organisation's responsibilities for the control of Legionella are met; and that all individuals and organisations assigned to carry out tasks in the scheme of Legionella control are competent to do so. There may be more than one Responsible Person, each responsible for a part of the undertaking

6.3 Deputy Responsible person – The person with the responsibility for the day-to-day running of the service and who reports to and supports the Responsible Person

6.4 Appointed person - Appointed by the Responsible Person. Takes day to day responsibility for controlling any identified risk from Legionella bacteria. Nominated by the Responsible Person to manage Specialist contractors and to witness test, carry out audit checks under the terms of the contract.

6.5 Biofilm - a community of **bacteria** and other **microorganisms**, embedded in a protective layer with entrained debris, attached to a surface.

6.6 Dead leg - pipes leading to a fitting through which water only passes infrequently when there is draw-off from the fitting, redundant or abandoned legs of pipework.

6.7 Written scheme of control - a risk management document identifying measures to be taken to control water systems and reduce the risk of Legionella bacteria.

7. Understanding Legionella

7.1. Legionella bacteria are widespread in natural water systems, such as rivers and ponds. However, the conditions are rarely right for people to catch the disease from these sources. Illness can occur from exposure to legionella growing in purpose-built systems where water is maintained at a temperature high enough to encourage growth, for example hot and cold-water systems, storage tanks, pipework, taps and showers, etc. Certain conditions increase the risk from legionella if:

- water temperature in the range of 20 to 45 degrees centigrade,
- it is possible for breathable water droplets to be created and dispersed, for example, aerosol created by a cooling tower, or water outlets
- water is stored and/or recirculated

- there are deposits that can support bacterial growth providing a source of nutrients for the organism, such as rust, sludge, scale, organic matter and biofilms
 - biofilms, sludge and scale can protect the bacteria from temperatures and concentrations of biocide that would otherwise kill or inhibit growth if they were freely suspended in water.
- 7.2. Legionnaires' disease is normally contracted by inhaling small droplets of contaminated water (aerosols), suspended in the air, containing the bacteria.
- 7.3. Person-to-person spread of the disease has not been documented. Initial symptoms include high fever, chills, headache, and muscle pain. It can be treated effectively with an antibiotic erythromycin or a similar antibiotic.
- 7.4. It can affect anyone; however, some people are at higher risk of infection including people (particularly males) over 45 years of age, smokers and heavy drinkers, people suffering from chronic respiratory disease, and anyone with an impaired immune system (immunosuppression). Legionella bacteria can also cause less serious illnesses which are not fatal or permanently debilitating. The collective term used to cover the group of diseases caused by Legionella bacteria is Legionellosis.

8. Assets and asset register

- 8.1. A formal asset register (water tanks) identifying the location and condition of all water tanks is currently in place and will be updated when any upgrade works take place. This will also include risk assessments, schematics, routine inspections, samples/tests, faults, repairs, and test certification. The asset register (water tanks) will be made freely available to staff and contractors.
- 8.2. The relevant premises in respect of legionella risk would generally relate only to the premises with 'stored water'. However, the Council recognises the potential risks associated with all premises, particularly where they become void, and water may lie undisturbed in the pipework. Therefore, the Council considers all premises as relevant for legionella management and the asset register. The responsible person will maintain an asset register of all premises, including an asset list of water system assets and a schematic of the water system where available.

9. Risk assessment

- 9.1. The Council will undertake a programme of legionella risk assessments and risk assessment reviews of properties containing any water system that could present a risk of exposure to legionella. These risk assessments will be reviewed at least every two years, or after any works have been completed to the installation.
- 9.2. Risk assessments are required to be completed for all water systems that have the potential to expose persons to legionella bacteria; this could be

directly from the water system or due to the work that is being carried out on the water system. The risk assessment must:

- Be written and completed by a competent person/contractor.
- Be suitable and sufficient.
- Describe the means by which exposure to the legionella bacteria will be prevented; or
- If prevention is not reasonably practicable, the particular means by which the risk from exposure to legionella bacteria is to be controlled.
- Be effectively communicated to relevant persons so they understand the controls they require to maintain a safe place of work.

9.3. Risk assessment categorisation

The Council will identify their properties into 3 risk categories based on their knowledge of the sites, their water systems, and occupant types.

Risk category	Site type	Typical control scheme
High Risk	Sites with susceptible groups of tenants such as supported accommodation	Control Scheme derived from full Risk Assessment (RA) in line with L8 requirements. Fully conforming to the recommended frequencies for the management of Hot & Cold-Water Systems Risk Assessment reviewed on a 2-year basis.
Medium Risk	Sites which have communal areas and / or with stored water/showers and Calorifiers.	Control Scheme derived from full initial Risk Assessment (RA) in-line with L8 requirements. Fully conforming to the recommended frequencies for the management of Hot & Cold-Water Systems Risk Assessment reviewed periodically based on recommendations of initial Risk Assessment. For those RAs not required after initial RA a minimum of Annual Inspection and Disinfection of Shared Cold Storage and related down-services shall be undertaken. Tenants provided with practical information (media, post, leaflets etc) on an annual basis, to help minimise the risk of Legionella exposure.
Low Risk	Sites with dedicated store services which are contained on site.	Tenants provided with practical information (media, post, leaflets etc) on an annual basis, to help minimise the risk of Legionella exposure.

- 9.4. It may be the case that in the initial stages of assessment it is not possible to assign a property into either category. In this case the higher risk category (High Risk) will be applied. The responsible person must ensure that any property that has a water supply that could reasonably produce a water aerosol is subject to a risk assessment.
- 9.5. It is acceptable for a desk-top study and archetype survey programme to be carried out where there are large numbers of similar properties e.g., terraced houses or flats. Where a desk-top approach is taken and the sites are deemed to be low risk and not requiring site visits to physically assess the risk, a sample should be taken to confirm the desk-top risk assessments findings. An acceptable figure would be 5% of each property type.
- 9.6. To provide a full risk assessment as required for (High Risk) sites, it is necessary for a survey to be undertaken of the water systems within a property. This is used to assess the potential of exposure of persons to Legionella bacteria. The assessment will highlight areas of concern and will recommend where changes (both physical and procedural) are required and will form the backbone of a written scheme for controlling the risk from exposure.
- 9.7. Physical changes can involve replacing or reconfiguring system components, as well as increasing temperatures and throughputs to minimise the potential proliferation of legionella bacteria and other microorganisms.
- 9.8. Procedural changes will involve keeping records to ensure that the system operating parameters identified as required are not deviated from.
- 9.9. Council arrangements for the implementation of this plan are based on the categorisation of property types from historical information, already on record.
- 9.10. This categorisation includes a risk assessment of the water system type, ranging from stored water systems to combi-boiler types. It also considers the occupants of the site, which can vary from typical tenanted properties to supported accommodation for the disabled or elderly.
- 9.11. Ongoing maintenance and control scheme requirements may include full monthly temperature monitoring, regular cleaning of systems, and providing tenants with ongoing or periodic information on minimising any risks from Legionella.
- 9.12. **The site survey will be conducted and will include the following tasks:**
- Inspection and assessment of the condition of system water and accessible equipment and an assessment of the contribution to risk made by the design, construction, and operation of the system (condition surveys).

- Gather detailed information on the system design, susceptibility of population, proliferation, dissemination of bacteria via aerosols, control measures, and management.
- Where it is not possible to inspect all parts of the system and it is not possible to determine the system condition from other evidence, it may be necessary to postpone the assessment and return at a later date when access can be arranged.
- Identify risk factors and problematic areas for all plant, equipment, and assets associated with the water system.
- Appraisal of the inherent risk presented by the system before any controls are applied.
- Appraisal of the residual risk presented by the system when the controls in place are applied.
- Appraisal of any risk gap between residual risk and the as low as reasonably practicable risk review of any previous risk assessments
- Make prioritised remedial recommendations to reduce potential risk.
- Preparation of new schematic diagrams and asset registers
- Produce a site-specific written scheme for the prevention and control of the risk.

9.13. Reporting on risk assessment

The Contractor must ensure that the assessment contains the following:

- The scope of the assessment, including clear identification of buildings, systems assessed and their use.
- The identification of which systems can potentially present a legionella risk and those which cannot.
- Analysis and evaluation of risk for each system including an explanation of how the risk rating is derived.
- Identification of key personnel, both staff and contractors, and an assessment of their competence
- Schematic diagrams
- The results of condition surveys including operating parameters, temperatures, system inspections and asset registers
- Any limitations of the assessment
- Any matters or areas of evident concern identified which fall outside the scope of the assessment.

- Details of the assessor and the person involved in quality assurance reviewing the assessment report (if different)
- Prioritised recommendations for corrective actions to eliminate or reduce the risk. Corrective actions being Urgent (24 hours), High (7 days), Medium (28 days) and Low (6 months).
- The report should give recommendations for site and system specific control measures (monitoring, inspection, and treatment, etc.) including identification of sentinel outlets and/or other sample and inspection points.
- The recommended review date and guidance regarding the circumstances under which a reassessment will be required.

9.14. Risk assessment review

- In High-Risk Sites where full risk assessments have been conducted by the Responsible Person and the Contractor, Croydon Council will arrange for the risk assessment to be reviewed every two years.
- Where Risk Assessments have taken place in initially categorised Medium Risk sites. Categorisation may be amended after the Risk Assessment and the property re-categorised as a High Risk site. This is at the discretion of the Risk Assessor.
- The responsible person will keep records of the dates of the last risk assessment and arrange for repeat inspections to be carried out.
- It may also be necessary to carry out ad-hoc risk assessment reviews at other times, for example following major refurbishment works or changes of use to the building.
- In Medium Risk sites where annual inspection and disinfection of shared stored cold-water services are carried out. The annual inspection and disinfection certificate will be retained by the responsible person who will keep records of the dates of the last inspection / disinfection and arrange for repeat inspections to be carried out annually.

10. Preventing and controlling risks

10.1. General precautions

- 10.1.1. Where it is not possible to remove or reduce risk of legionella bacteria, we will control the risks in accordance with the HSE Approved Code of Practice by:
- Controlling the release of water spray.
 - Avoiding water temperatures in the range of 20 to 45 °C.
 - Avoiding water stagnation, which may encourage growth of biofilm.

- Avoiding use of materials which can harbour or provide nutrients for bacteria.
- Keeping the system clean to avoid build-up of sediments.
- Taking actions to ensure the correct and safe operation and maintenance of the water system.
- Flushing out the system before letting the property
- Avoiding debris getting into the system (e.g., Ensure the cold-water tanks, where fitted, have a tight-fitting lid)
- Setting control parameters (e.g., setting the temperature of the calorifier to ensure water is stored at 60 °C)
- Making sure any redundant pipework identified is removed.
- Advising tenants to regularly clean and disinfect showerheads.

10.2. Written scheme of control

10.2.1. Once the risk has been assessed, a written scheme shall be prepared for preventing or controlling it. The primary objective shall be to avoid conditions which permit legionella bacteria to proliferate and to avoid creating a spray or aerosol. Legionella bacteria may be present in very low numbers in many water systems, but careful control will prevent them from multiplying.

11. Planned and remedial work programmes

11.1 Depending on the outcome of the risk assessment, controls may include taking any of the following measures to prevent and control the growth of Legionella within water systems:

- Replacement of storage tank water systems with combination boilers throughout our stock over a period of time whenever planned works are carried out.
- Replacement of cold-water tanks, where identified as badly corroded or non-compliant with the Water Regulations 1999.
- Disinfection of cold-water system, where identified as necessary during inspection.
- Thermal insulation of cold-water tanks to prevent heat build-up in warm weather, where identified as necessary during inspection.
- Thermal insulation of all hot and cold-water pipe work in service voids, where identified as necessary during inspection.
- Designing out risks by installing a combination boiler instead of a storage tank system during refurbishments and when carrying out planned improvements works.

- Where modifications to existing plant or water systems may create a risk of legionella bacteria growth, the person in charge of such work shall ensure that the risk is avoided. Where it is not practical, the system should be designed and constructed so that it will be safe and without risk to health. Any necessary review of procedures, assessments, maintenance programmes, monitoring, etc. should be undertaken.
- Adequate information on the risks and the conditions necessary to ensure the plant or water system is safe to health, shall be specified as a requirement from the designers and manufacturers of the plant and water systems.
- Suppliers of services and products used in consultancy and water treatment aimed at preventing and controlling legionella bacteria, shall provide information on the safe and proper use of their products and any potential limitations on their expertise or products. All new plant or water services must be properly installed and commissioned before use.
- Installation of showers; The risk of getting in contact with Legionella is higher where there is high level of spray and aerosols, as occurs during use of showers. When showers are installed in properties following occupational therapist recommendation, the tenant should be advised about the potential risks and the necessary precautions to be taken.

12. Void properties

12.1 When a building is unoccupied, there is likely to be lower water turnover which increases the risk of Legionella growth in the water system. To mitigate the increased potential risk associated with voids, an appointed contractor will carry out and record the following:

- Thoroughly flush all taps
- Clean and disinfect, or replace, all showerheads.
- Inspect and report on the water storage tank, where present, and confirm any properties moved over to a mains fed supply.
- Where positive tests have been identified, the system will have been drained, disinfected, and re-commissioned.

13. Statutory notification

13.1 Should an employee of the Council contract legionellosis resulting from work relating to cooling towers or hot water systems which are suspected to be contaminated with legionella, a report of the incident shall be made under Reporting or Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).

14. Reasonable Adjustments

14.1 Croydon Council will make reasonable adjustments to support our residents' needs when they access our services. The term 'reasonable' refers to what we can do without compromising our resources, efficiency, or ability to practically fulfil requests. This does not include [Aids and Adaptations](#) to our properties and common parts of a building.

14.2 No resident should be at a disadvantage when accessing our services. The following statements offer a general overview to ensure that our services are adjusted to meet the needs of our residents where possible. This list is not exhaustive, and we will adapt our approach based on individual resident needs.

14.3 We aim to provide services that are accessible to all who require them. As a result of this, we will:

- Ensure our officers get to know our residents and their individual needs
- Provide a range of ways for residents to contact our officers including phone, mail, email and via [Housing Online](#)
- Provide alternative communication methods on request, such as Braille, foreign language interpreter, large print etc.
- Ensure residents are always able to select their preferred method of contact.
- Ensure our offices are fully accessible to visitors

14.4 We will continue to diversify our services to meet residents' needs where possible.

15. Competence

15.1. Responsible Person

A Responsible Person will be provided with regular training so that they are properly updated on changes in legislation and best practice in the management and control of legionella in water services. The scope and effectiveness of the training shall be reviewed at least annually to ensure that the personnel involved are competent and capable of performing their specific duties.

15.2. Other Council staff

The Council will carry out Legionella awareness training for all staff whose duties require them to have knowledge and understanding of how to control and minimise the risks from Legionella.

15.3. Contractor

The designated Contractor must be registered with the Legionella Control Association (LCA). The Code of Conduct requires that Contractors establish an appropriate management system for the provision of services associated with the control of legionella.

As a minimum the Contractor must hold LCA registration under the following service categories: -

- Legionella Risk Assessment Services
- Hot and Cold-Water Monitoring and Inspection Services
- Cleaning and Disinfection Services
- Legionella Analytical Services

15.4. Risk assessors

The designated risk assessors shall be trained to at least a City and Guilds accredited course that is BS8580-1:2019 compliant such as "Legionella Risk Assessment of Commercial Hot and Cold-Water Systems" or equivalent and be a member of relevant professional institutions. It is essential that they are competent and experienced in carrying out legionellosis risk assessments.

15.5. Competent external consultants

Where consultants have been appointed to carry out and report Legionella risk assessments and reviews, including cold water storage tank inspections, they must report their findings in a format which is easily understandable and acceptable to the Legionella Responsible Person and the Legionella contractor.

16. Roles and responsibilities

16.1. Director of Housing – Assets & Repairs

- Overall responsibility for the control of legionella in water systems across the domestic housing stock owned, managed, and leased by the council.
- Provision of the necessary resources for the successful implementation of the legionella policy.
- Appoint, in writing, a responsible person with the necessary competence, knowledge and authority adequate to fulfil the role.

16.2. Head of Compliance

- Ensuring the implementation of this policy within their service
- Monitoring the adherence of this policy and reporting any non-compliance to the Directorate Management Team

16.3. Electrical, Lifts and Water Manager – Responsible Person

- Responsible for overseeing the operational delivery of all aspects of the policy
- Supporting the Head of Building Safety and Compliance

16.4. Water Hygiene and Legionella Manager – Deputy Responsible person

- Responsible for the day-to-day operational delivery of all aspects of this policy.
- Support the Electrical, Lifts and Water Manager
- Act as the organisation's lead for Legionella Management providing technical advice and guidance to staff.
- Ensure that the Council continues to work in-line with the most up-to-date industry guidance.
- Establish and maintain direct lines of communication with the various operational parts of the Council's operational structure and specialist contractors, ensuring a smooth two-way exchange of information and records.
- Ensure all details, outcomes, and actions agreed in contractor review meetings are recorded in writing and circulated to relevant Council officers and specialist contractors.
- Make reasonable enquiries to ensure that the contractor and their staff are competent and suitably trained to a level commensurate with the tasks they are required to carry out.

16.5. Building/Premises Managers - Appointed Person.

The appointed person will ensure that, so far as is reasonably practicable, that the following requirements are met at the premises under their control:

- In high-risk sites where a full risk assessment has been conducted, the associated survey report will be held electronically on internal Council systems. This will be always available for consultation by any person who may need access to the information.
- Access to the database holding electronic copies of all completed risk assessments is available.
- Adequate arrangements, including risk assessments, for the management of water systems to prevent employees and other persons becoming exposed to Legionella or excessive water temperatures are in place.
- Inspection reports are maintained, and adequate internal records are maintained of all temperature checks, cleaning and de-scaling, disinfections, and flushing of low-use outlets.

- Alterations and modifications to the water systems are logged within the appropriate internal systems to ensure an accurate record of the site's water system can be viewed at any time.
- Contractors working on the water or water heating system, are suitably qualified and have clear directives in relation to dead legs in pipework.
- Ensure sites identified as having the requirement, showerheads are cleaned quarterly using a suitable solution and this information is recorded within the manual. A copy of the corresponding COSHH data sheet and assessment must also be placed within the manual if applicable.
- Take action to address any comments recorded by the water hygiene contractors following their servicing of the water system.
- Co-ordinate two yearly risk assessment review programmes of all water systems
- Investigating and advising on cases of exposure to Legionella, and other bacteria.
- Auditing the water system management processes.

16.6. Water Hygiene and Legionella Contractors

Specialist legionella contractors will be appointed to carry out all Legionella related inspections and works including:

- Carrying out legionella risk assessments (complete with schematics)
- Monitoring, flushing, and cleaning (weekly, monthly etc)
- Periodic sampling
- Remedial works and treatments
- Data collection and maintaining records.

16.7. Staff with responsibility for arranging works to premises.

Staff with responsibility for arranging work to premises must ensure, as far as it reasonably practicable, that:

- They record and archive all relevant historical water system documentation.
- They notify directorates if they are unable to conduct checks or implement actions or tasks of whatever kind to secure compliance with their responsibilities in respect of water systems as outlined above.
- Ensure that alterations and modifications to the water systems are logged by contractors within the appropriate internal systems to ensure

that an accurate record of the sites water system can be viewed at any time.

17. Resident Communication

- 17.1. Tenants will be provided with information on good water management and Legionella control through tenancy agreements and/or by means of information leaflets.

18. Record Keeping

- 18.1. The contractor will provide the Council with access to a suitable web-based reporting system. The systems will allow immediate access by the Council to the water hygiene monitoring results, monitoring/maintenance reports and a management overview. This information needs to be available from any location with internet access. The client must be able to download reports in format pdf/word/excel.
- 18.2. The process of record keeping shall be constant in accordance with the timescales set out within in the Legionella Management Plan. All legionella records shall be retained for a minimum period of five years.
- 18.3. Legionella risk assessments and written schemes are to be retained throughout the period they remain current (maximum of two years) and for a minimum of two years after that period.
- 18.4. The results of monitoring, inspections, tests, checks, temperatures and works undertaken, are to be recorded and will be retained for at least five years.
- 18.5. Dates and signatures will be required on all records for monitoring, inspections, tests, checks, and works undertaken.
- 18.6. Following the disposal of any Council-owned, managed, or leased properties legionella records are to be retained in accordance with the above.

19. Performance monitoring

- 19.1. Key Performance Indicator (KPI) measures will be established and maintained to ensure the Council is able to report on performance in relation to water hygiene/legionella safety. This will be reported to the Housing Directors on a monthly basis.

20. Quality assurance

- 20.1. The Contractor must post inspect at least a 10% sample of service visits each month. Reports detailing the post inspections should be provided to the Council within five working days. The inspection report must contain as a minimum:

20.2. A sample of the inspection, servicing and installation work that may be checked independently by an external organisation employed by the Council. Some of this quality control work may be carried out whilst works are in progress and the Contractor will be expected to co-operate in this respect. The result of such quality control works will be given to the Contractor and there will be an expectation that any complaint highlighted will be addressed by the Contractor and that the Contractor demonstrates the actions to be taken.

20.3. The Council will appoint a competent person to complete a programme of third-party compliance audits to 5% of written schemes of control to ensure that all control actions are being fully and robustly implemented. In addition, all schemes identified as high risk will receive an annual audit.

21. Complaints

21.1. Complaints from tenants concerning any aspect of the water hygiene and legionella, this will be dealt with via the Council's Corporate Complaints Policy.

22. Stakeholder consultation

22.1. Stakeholders with responsibility and operational knowledge of water hygiene and legionella, have been consulted during the development of this policy.

22.2. The Council's Legal team has reviewed the policy.

22.3. Residents have also been engaged and consulted in the development and review of the Water Hygiene and Legionella Policy.

23. Monitoring and Review

23.1. This policy will be reviewed every two years, or sooner if required by statutory, regulatory, best practice, emerging developments, or circumstances arising from reviews of other Council-wide policies.

23.2. Arrangement for a full internal audit of our water hygiene and legionella processes will be undertaken by the Council's Internal Auditors. The full scope of the audit will be agreed upon with the Internal Auditors, Director of Asset and Repairs, and Heads of Service.

24. Document Control

24.1. This is a controlled document and should not be changed unless by authorisation of the policy owner.

Monitoring	
Approved Date:	19 November 2024

Next Review Date:	01 April 2026
Effective date:	20 November 2024
Consultation Review	
Stakeholders review:	30.10.2024
Legal review date:	11.11.2024
Residents Reading Group:	11.11.2024
Policy owner:	Director of Assets and Repairs
Ratified by:	Housing DMT on 19 November 2024
Equality impact assessment:	The impact of this policy will be measured as it is implemented and used as part of a scheduled 1-year implementation compliance review.

Version Updates		
Version Number	Summary of change	Author and Approver
1.0	New Policy	Developed by housing subject matter experts and the residents' reading group

APPENDIX 1: Action levels following the detection of Legionella in a water system

Legionella bacteria (cfu/litre)	Action required.
More than 100 but less than 1000	Either: a) If only one or two samples are positive, system should be resampled. If a similar count is found again, a review of the control measures and risk assessment should be carried out to identify any remedial actions. b) If the majority of samples are positive, the system may be colonised, albeit at a low level, with legionella. Disinfection of the system should be considered but an immediate review of control measures and risk assessment should be carried out to identify any other remedial action required.
More than 1000	The system should be resampled, and an immediate review of the control measures and risk assessment carried out to identify any remedial actions, including possible disinfection of the system.

APPENDIX 2: Action in the event of a case of a Legionella outbreak

1. An outbreak is defined by the Public Health Laboratory Service as two or more confirmed cases of legionellosis occurring in the same locality within a six- month period, in the event of an outbreak an investigation will be carried out by the Public Health Authority, further details are below.
2. If it is suspected or confirmed that an employee or resident in a Council controlled property has contracted Legionnaires Disease, there is a legal obligation to report this to the Health and Safety Executive (under RIDDOR). This report should be made by a member of the Health, Safety and Compliance Team.
3. If the outbreak is confirmed as originating within a Council property, the responsible person will provide any such details and records as the investigating department require. The responsible person will also ensure that directors and insurers are informed of a potential investigation and its progress. An emergency action team should be set up to deal with any requirements for rectifying the situation. This could involve but not be limited to:
 - a) Decanting of tenants
 - b) Cleaning and disinfection of the system
 - c) Microbiological analysis of the water system
 - d) Evaluation of monitoring/cleaning records
 - e) Co-operation with investigating bodies
 - f) Dealing with media enquiries
4. The team should comprise of:
 - Chief Executive & Directorate Level (on a reporting to basis only)
 - Head of Building Safety and Compliance
 - Asbestos & Legionella Manager (Responsible Person)
 - Repairs Manager (on a communication level to front-line customers)
 - Compliance Administration

APPENDIX 3: Decommissioning and recommissioning of water system

Decommissioning

1. If a property is to remain unused for an extensive period (over 4 weeks), it is recommended that the water systems are drained down fully, ensuring that all calorifiers and water heaters are taken off-line.
2. For shorter periods that exceed 1 week follow the procedure described below. For flushing little used outlets during the period of disuse to prevent the water stored within the systems from becoming stagnant.
3. Flush through and purge to drain without the release of aerosols all little used outlets – including taps, showers, and toilets. Outlets should run for 5 minutes, with care being taken regarding drainage capability.

Recommissioning

4. If a system has been out of use and not regularly flushed or it has been drained down, it will require disinfecting prior to being used. This process should be carried out by a competent person (Contractor) as the levels of disinfectant must be carefully controlled. There may be airlocks within the system that will require removal if it has been drained down and refilled.
5. Where a system has been out of use but regularly flushed in accordance with the procedure described above, cold systems may be returned to normal use with no further measures to be taken.
6. In larger Recirculating Systems (such as HMOs), Hot water systems should be brought to full operating temperature (with all recirculating pumps operating where fitted). They are to be maintained at this temperature, for a minimum continuous period of one hour before returning the system to use.