

Legionella Management Policy

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Contents

1. Introduction.....	3
2. Statement of Objectives.....	3
3. Compliance with Regulatory Standards	3
4. Expected Outcomes	3
5. Corporate Fit.....	4
6. Legionella Bacteria and Legionnaires disease	7
7. CVHA's Duties under the Law.....	7
8. Assessing the Risk of CVHA Assets	7
9. Training and Competence.....	8
10. Record Keeping.....	8
11. Notification Requirements.....	9
12. Business Plan Impact	9
13. Monitoring and Review	9
Appendix 1 - Legionella Management Plan	10
Policy Change History	21

1. Introduction

This policy details the approach to be taken by Clyde Valley Housing Association (CVHA) to manage the control of Legionella within the Association's housing stock and commercial premises.

The Legionella Management Policy has been set by the Board of CVHA and will be operated by officers of CVHA.

2. Statement of Objectives

The Legionella Management Policy aims to ensure that the Association effectively administers compliance with its landlord obligations in respect of legionella management and thereby seeks to provide assurance to the Association's Board. The main objectives of this policy include:

- Ensuring that systems are in place to enable the Association to comply with its duties in relation to Health and Safety at Work Act 1974, Management of Health and Safety at Work Regulations 1999, Control of Substances Hazardous to Health Regulations 2002, and Approved Code of Practice L8 Legionnaires' Disease: The Control of Legionella Bacteria in Water Systems.
- Operate an effective legionella management system.
- Ensuring that an audit trails exist within the legionella management process.
- Reviewing policies, procedures and systems regularly to ensure they are up to date and reflect current best practice guidance and legislation.
- Identify all water plant and systems which present a potential risk of exposure to legionella bacteria.
- Monitor compliance with the written scheme and review risks and the performance of the risk control measures, revising risk assessments and written control schemes as required.
- Employ only competent, adequately qualified and trained personnel and service providers.

3. Compliance with Regulatory Standards

In terms of the Scottish Social Housing Charter, the Scottish Housing Regulator has identified a number of key indicators relevant to housing maintenance by which it will measure landlord performance, including the following:

- Meet the Scottish Housing Quality Standard (SHQS)
- Meet the Energy Efficiency Standard for Social Housing (EESH) by March 2020
- When they are allocated, are always clean, tidy and in a good state of repair.
- That tenants' homes are well maintained, with repairs and improvements carried out when required, and tenants are given reasonable choices about when work is done.
- Tenants, owners and other customers receive services that provide continually improving value for the rent and other charges they pay.

4. Expected Outcomes

Key outcomes of operating an effective Legionella Management Policy include:

- That all employees, customers, and visitors are not exposed to any risk arising from legionella when visiting or occupying any buildings under our management

5. Corporate Fit

5.1. Legislation and Guidance

CVHA will comply with all relevant legislation, regulations and approved codes of practice in relation to legionella management. This will include:

- The Health and Safety at Work Act 1974.
- British standards 8580:2010- water quality: risk assessment for legionella
- Management of Health and Safety at Work Regulations 1999.
- Control of Substances Hazardous to Health Regulations 2002.
- INDG 458 legionnaires disease- a brief guide to duty holders
- Approved Code of Practice L8, Legionnaires' Disease, The Control of Legionella Bacteria in Water Systems 2013.
- HSG274 Legionnaires' Disease (Parts 1-3, where relevant)
- The Housing (Scotland) Act 2014.
- Public Health (Scotland) Act 2008.
- Environmental Protection Act 1990.
- Data Protection Act 2018.
- The General Data Protection Regulation (EU) 2016/679 (the "GDPR"); and
- Performance Standards for Registered Social Landlords.

CVHA's Legionella Management Policy is consistent with our Housing Maintenance Policy Guide, Asset Management Strategy, Health and Safety Policy and Risk Management Strategy.

Equalities

CVHA's Legionella Management Policy complies with CVHA's Equality Policy to ensure equality of treatment for all tenants without discrimination or prejudice. At all times CVHA will therefore consider all customers, regardless of sex, faith or religion, race, ethnic origin, sexual orientation, mental or physical health, disability or marital status.

Confidentiality

CVHA recognises that confidentiality is important to tenants and will treat their tenancy information in the strictest confidence under the Data Protection Act 2018 and in line with CVHA's Openness and Confidentiality Statement.

Business Plan and Risk Management

CVHA's Business Plan reflects that legionella management responsibility/requirements of a landlord. We seek to mitigate against business risk through managing legionella in an efficient, effective and economic manner.

Roles and Responsibilities

The Board will monitor the implementation of this policy to ensure that it is properly operated, that there is appropriate officer involvement in the processes used in managing legionella, and that there is effective scrutiny of the Legionella Management Policy.

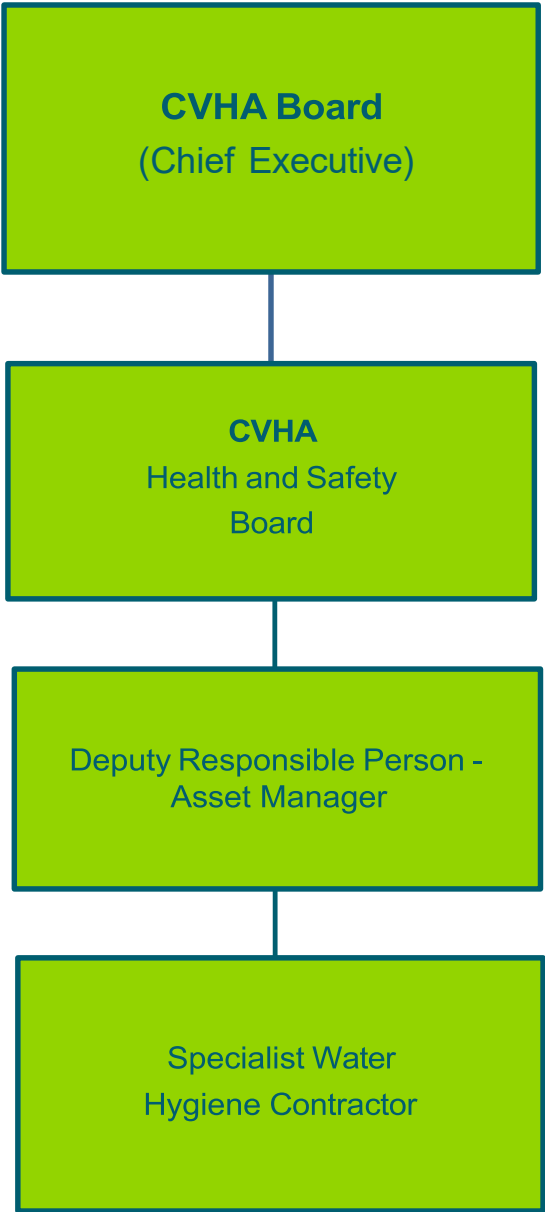
The Board will ensure that the Legionella Management Policy is meeting its intended objectives, and that appropriate monitoring and reporting of activities takes place.

In implementing its Legionella Management Policy certain functions are the responsibility of the Board or nominated committee, although staff members have delegated authority to undertake many tasks.

The LB ACoP requires that as part of our Management Policy certain roles are defined, the following persons have responsibilities under this policy:

Role	Name	Function / task	Responsibility
Duty Holder	Clyde Valley Housing Association Board	Legal duty holder for Health and Safety	Corporate responsibility to ensure that Association are implementing and complying with legal Health and Safety obligations.
Quarterly Monitoring	Health and Safety Board	Monitor Health and Safety	Monitor performance against Policy
Responsible Person	Investment Director	Overall management responsibility for Legionella Management	Investment Director responsible for the operational procedures that reflect the principles set out within the Legionella Management Policy.
Deputy Responsible Persons	Repairs Manager/Asset Manager	Implementation and delivery of Legionella Management Policy	Undertake the day to day management responsibility for implementing this policy
Risk Assessments and LB works	Legionella Contractor	Provide specialist services in relation to the management of legionella	Undertake the required Risk Assessments, mitigation and monitoring measures as required under their appointment

The lines of communication between the roles identified within section 7.4 of the ACOP are as follows:



6. Legionella Bacteria and Legionnaires disease

Legionella bacteria is common in natural water course such as rivers and ponds. Since legionella are widespread in the environment, they may contaminate and grow in other water systems such as cooling towers, evaporative condensers, showers, spray apparatus and hot and cold water systems.

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).

Legionnaires Disease is a potentially fatal form of pneumonia caused by the inhalation of legionella bacteria. This includes the most serious legionnaires' diseases, as well as the similar but less serious conditions of Pontiac Fever and Lochgoilhead Fever. The bacteria is 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. There is no evidence that Legionnaires Disease can be contracted from person to person or by drinking water contaminated by legionella bacteria.

Legionnaires Disease has the potential to affect anybody. However, persons more susceptible are normally in the age range of 45 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.

Legionellae survive low temperatures and thrive at temperatures between 20-45°C if the conditions are right, e.g., if a supply of nutrients is present such as rust, sludge, scale and other bacteria. The legionella bacteria are killed by high temperatures.

7. CVHA's Duties under the Law

As an employer and a landlord in control of premises, we must:

- Identify and assess sources of risk.
- Prepare a scheme for preventing or controlling the risk.
- Implement and manage the scheme.
- Keeping records and check what has been done is effective

8. Assessing the Risk of CVHA Assets

Clyde Valley Housing Association shall undertake the necessary steps to assess sources of risk across our asset base. To achieve this, we shall carry out a suitable and sufficient assessment to identify and assess the risk of exposure to legionella bacteria from the water systems contained within our properties.

We shall ensure that the risk assessment identifies and evaluates:

- The particular means of preventing exposure to legionella bacteria; or
- If prevention is not reasonably practicable, the particular means of controlling the risk

from exposure to legionella bacteria

- The risk to health, whether the potential harm to health from exposure is reasonably foreseeable, unless adequate protections are taken.
- The necessary measures to prevent, or adequate control, the risk from exposure to legionella bacteria.

Where required the Association shall employ the services of a competent person to undertake the risk assessments.

The risk assessments shall be regularly reviewed and updated where it is believed that the original risk assessment is no longer valid.

The risk assessment shall take into account the following factors:

- Evaluate the nature of each site.
- Consider the whole system, and not individual parts of the system.
- Presence of legionella bacteria.
- Conditions suitable for growth of the organisms, e.g., suitable water temperatures 20°C
- -45°C; and presence of nutrients such as sludge, scale, rust, algae or other organic matter.
- Are these means of creating and spreading breathable droplets, e.g., the aerosol generated by cooling towers, shower or spa pools.
- The presence of occupants that would be classes as vulnerable, including quantifying the numbers.
- The source of system supply water.
- Possible sources of contamination.
- Plant operating characteristics.
- Unusual, but foreseeable operating conditions.
- Use of disinfection systems.
- Review of control measures.
- Local environment.

9. Training and Competence

An assessment shall be undertaken to assess the training requirements of the persons with responsibilities under this policy. Training should be undertaken by each relevant person to ensure that they have the requisite knowledge and competence to undertake their appointed role.

The Association shall retain a record of all training undertaken in relation to the management and control of legionella.

Refresher training should be undertaken on a periodic basis, particularly where changes to Regulation, Approved Codes of Practice or best practice occurs.

Where the Association appoints a contractor to undertake water hygiene works, this contractor shall be required to demonstrate its competence to undertake the required tasks. As a minimum requirement, contractors are required to be a registered member of the Legionella Control Association (HCA).

10. Record Keeping

The Association understand the importance of accurate record keeping, and shall undertake the following in relation to the management of legionella within our properties:

- The Association shall maintain a record of all legionella risk assessments which have been carried out,
- The Association shall maintain a record of all mitigation/risk reduction works carried out or required on a regular basis.
- The Association shall maintain a record of all monitoring and checks that are carried out, these should be recorded within each properties logbook.
- The Association shall maintain legionella logbooks at each commercial property; these shall be regularly updated with the required information. Each logbook should be made available for both the facilities management company and water hygiene specialist contractor, and any other relevant party.

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.

11. Notification Requirements

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

12. Business Plan Impact

CVHA will allocate sufficient resources from within its Business Plan to enable legionella inspections in all identified properties to be completed in accordance with this policy, and where required shall incorporate sufficient budget allocation to undertake any required mitigation works.

13. Monitoring and Review

CVHA will publicise its Legionella Management Policy.

CVHA will review its methodology for managing legionella every three years or sooner if required by Statutory, Regulatory or best practice requirements

The Responsible Person and/or deputies shall provide regular reports on the Association's performance with regard to the management of legionella. These reports should detail the outcome from any new or updated risk assessment, details of any ongoing mitigation works and confirmation that the appropriate mitigation strategies are being followed.

CVHA will complete the Health and Safety Executive "Control of legionella bacteria in water stems" checklist for our commercial buildings.

Appendix 1 - Legionella Management Plan

Introduction

The Approved Code of Practice - Legionnaires Disease, The Control of Legionella bacteria in water systems (L8) requires that we have a written scheme setting out the approach to be taken by the Association in controlling the risk of legionella. Within this document we have set out the approach to be taken for both domestic and commercial premises.

Precautionary Measures

The Association's primary objective is to avoid the conditions which permit legionella to proliferate and to avoid creating a spray or aerosol. It is accepted that the legionella bacteria is present in most water systems, but by undertaking good housekeeping we are able to minimise the conditions in which it would be able to multiply. We shall ensure that:

- Systems are operated safely and correctly and are well maintained.
- Material are avoided that can harbor or provide nutrient for micro-organisms.
- Nutrient is prevented from entering the systems where possible.
- The building up of sediments, scale deposits and corrosion is avoided.
- Suitable water treatment programmes are implemented where it is appropriate and safe to do so.
- Stagnation of water is prevented.
- Water is stored below 20°C or above 60°C.
- Water is distributed below 20°C or above 60°C.

Relevant Persons/Parties

The following persons/parties have day to day responsibility for the delivery of this Plan:

Name	Role	Contact
Lindsay Forrest - Investment Director	Responsible Person	01698 268855
Robert Pollock - Asset Manager	Deputy Responsible Person	01698 268855
Graham Collie - Asset Manager	Deputy Responsible Person	01698 268855
Water Hygiene Contractor - Domestic	ECG Facilities services Ltd	01698 828778
Water Hygiene Contractor - Commercial	IWS	01236 436686
Heating Maintenance Contractor	City Technical Services	08445 796 493
Commercial Premises FM Contractor	ECG Facility Services	0845 230 2308

Legionella Management Plan - Domestic Premises

It is generally accepted that levels of legionella bacteria found in typical domestic mains water supplies 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 a number of 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.

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.

When considering the CVHA domestic stock, we can broadly split the stock into two categories, these being direct main water supply, and indirect cold water storage tank supplied properties. We have conducted the following assessment to establish the level of risk associated with each category:

Category 1 - Domestic Direct Main with a non-storage water heat (Gas Combi Boiler or Electric Instantaneous Water Heater)

Property Characteristic	Property Assessment Details	Low	Medium	High
Type of water supply?	Direct Mains Supply			
Occupant Characteristics?	Varied ranging from age range and health conditions*			
No. occupants?	Generally, between 1 - 8			
Type of Heating and Hot Water system?	Gas Combi Boiler or Electric Instantaneous Water Heater			
Water Temperature?	Boiler hot water set to greater than 45°C			
Maintenance Regime?	Annual heating system service			
Showers Present	Not all properties will have showers fitted, for purpose of assessment assumed that all have.			
Spa Pools Present	Not present, any spa pools would be tenants responsibility			

Category 2 - Gravity Fed Water System without Recirculation

Property Characteristic	Property Assessment Details	Low	Medium	High
Type of water supply?	Indirect water supply, via cold water storage tank			
Occupant Characteristics?	Varied ranging from age range and health conditions*			
No. occupants?	Generally, between 1 - 8			
Type of Heating and Hot Water system??	Electric Storage or Gas System Boiler with Calorifier			
Water Temperature?	Boiler hot water set to greater than 45°C			
Maintenance Regime?	Annual heating service			
Showers Present	Not all properties will have showers fitted, for purpose of assessment assumed that all have.			
Spa Pools Present	Not present, any spa pools would be tenants responsibility			

*Due to the large size of the CVHA domestic housing stock and the wide range of occupants, we have based the following assessment on the assumption that the tenants are not classed as vulnerable. Where specific knowledge of a customer is available, which would indicate that they are maybe susceptible to legionella a site specific risk assessment should be undertaken.

Considering the above assessment in relation to Clyde Valley Housing Association's domestic stock, we can see that generally across the range of property categories that there is a relatively low risk of legionella.

There are two areas identified in the assessment that have been assessed as medium risk due to the type of water supply and source of hot water.

Risk Control Strategy - Domestic

Having considered the classifications above, we have implemented the following risk control strategies:

Low Risk Housing Stock (Categories 1)

The majority of the Association's housing stock falls into this category, where properties have modern direct water supplies. To minimise the risk, we shall:

- Undertake annual maintenance of heating and hot water systems within our properties.
- When works are carried out in our properties, it affects the water systems.
- specifications should include details of our requirement to ensure works remove the opportunity for stagnant water, i.e., dead legs.
- Where new works are specified within our properties, these shall be completed to comply with current water hygiene requirements.

Annually we shall communicate; by way of letter or newsletter article; with our customer advising of the risk of legionella and as measures that they can undertake to ensure the risk is

minimised, this should include advice on:

- Not adjusting hot water and boiler controls from their settings.
- Customer to advise the Association as soon as they have any issues with the operation of their boiler or hot water heater.
- For customer to advise us as soon as they notice that their cold water supply is running warm after a few minutes
- For customers to advise the Association if they notice changes in their water supply, particularly debris and discoloration
- Where showers are fitted, it is the tenants responsibility to ensure that if not in regular use that the shower is ran for 2 minutes each week, and.
- Regardless of frequency of use, that the tenant cleans and disinfected the shower head regularly, at least every six months, and.
- Where other water appliance and/or outlets (i.e., taps and WCs) are not used on a regular basis, these should be periodically used to ensure water is circulating within the system.

Medium Risk Housing Stock (Categories 2)

In addition to the measures listed for low risk housing stock, the Association shall also undertake the following items:

- The Association shall appoint a competent contractor to undertake a site specific Risk Assessment for each location classed as medium risk, these assessment should be conducted every two years, or where changes to the system occur.
- The Association shall undertake all risk reduction and preventative measures as identified within said risk assessments.
- The Association acknowledges that cold water storage systems prevent a higher risk of legionella than direct water supplies. The Association shall allow within its future expenditure programme for the replacement of cold water storage tanks with direct supplies where it is practical to do so.

Risk Control Strategy - Commercial Properties

To comply with our requirements for our commercial properties; and due to the more complex water systems within these; the Association shall appoint a competent water hygiene contractor to undertake site specific risk assessment.

Commercial Premises

- The Association shall appoint a competent contractor to undertake a site specific Risk Assessment for each location, these assessment should be reviewed and updated regularly, or where changes to the system occur.
- The Association shall undertake all risk reduction and preventative measures as identified within said risk assessment.
- The Association shall implement a maintenance programme to ensure all appliances are services and maintenance to a good standard.
- The Association shall undertake or appoint a contractor to undertake a programme of inspections/testing and samples to monitor the waters systems within each premises.
- The Association shall maintain written records at each site documenting the risk assessment, mitigation works and monitoring. These documents should be readily for inspection.

Commercial Premises - Maintenance and Monitoring Programme

The Association shall appoint competent contractors; or where suitable undertake the inspection/monitoring in house; to undertake the following items of maintenance and monitoring. In doing so we shall ensure that the conditions for legionella bacteria are minimised. The

programme shall follow the guidelines issued by the HSE in HSG274 Part 2, a copy of which is included below in Table 1.

The Association recognise that a key step in preventing legionella is the proper maintenance and operation of plant and systems. In addition to the specific details in Table 1, the Association shall also appoint competent contractors to undertake regular maintenance to ensure correct operation and performance.

Table 1 - Reproduced from HSE HSG274 Part 2 2014

Service	Action to be taken	Frequency
Calorifiers	Inspect calorifier internally by removing the inspection hatch or using a boroscope and clean by draining the vessel. The frequency of inspection and cleaning should be subject to the findings and increased or decreased based on conditions recorded	Annually, or as indicated by the rate of fouling
	Where there is no inspection hatch, purge any debris in the base of the calorifier to a suitable drain Collect the initial flush from the base of hot water heaters to inspect clarity, quantity of debris, and temperature	Annually, but may be increased as indicated by the risk assessment or result of inspection findings
	Check calorifier flow temperatures (thermostat settings should modulate as close to 60 °C as practicable without going below 60°C) Check calorifier return temperatures (not below 50 °C).	Monthly
Hot Water Services	For non-circulating systems: take temperatures at sentinel points (nearest outlet, furthest outlet and long branches to outlets) to confirm they are at a minimum of 50 °C within one minute (55 °C in healthcare premises)	Monthly
	For circulating systems: take temperatures at return legs of principal loops (sentinel points) to confirm they are at a minimum of 50 °C (55 °C in healthcare premises). Temperature measurements may be taken on the surface of metallic pipework	Monthly
	For circulating systems: take temperatures at return legs of subordinate loops, temperature measurements can be taken on the surface of pipes, but where this is not practicable, the temperature of water from the last outlet on each loop may be measured and this should be greater than 50 °C within one minute of running (55 °C in healthcare premises). If the temperature rise is slow, it should be confirmed that the outlet is on a long leg and not that the flow and return has failed in that local area All HWS systems: take temperatures at a representative selection of other points (intermediate outlets of single pipe systems and tertiary loops in	Quarterly (ideally on a rolling monthly rota) Representative selection of other sentinel outlets considered on a rotational basis to

Service	Action to be taken	Frequency
	circulating systems) to confirm they are at a minimum of 50 °C (55 °C in healthcare premises) to create a temperature profile of the whole system over a defined time period	ensure the whole system is reaching satisfactory temperatures for legionella control
POU water heaters (no greater than 15 litres)	Check water temperatures to confirm the heater operates at 50-60°C (55 °C in healthcare premises) or check the installation has a high turnover	Monthly-six monthly, or as indicated by the risk assessment
Combination Water Heaters	Inspect the integral cold water header tanks as part of the cold water storage tank inspection regime, clean and disinfect as necessary. If evidence shows that the unit regularly overflows hot water into the integral cold water header tank, instigate a temperature monitoring regime to determine the frequency and take precautionary measures as determined by the findings of this monitoring regime	Annually
	Check water temperatures at an outlet to confirm the heater operates at 50-60°C	Monthly
Cold Water Tanks	Check the tank water temperature remote from the ball valve and the incoming mains temperature. Record the maximum temperatures of the stored and supply water recorded by fixed maximum/minimum thermometers where fitted	Annually (Summer) or as indicated by the temperature profiling
	Inspect cold water storage tanks and carry out remedial work where necessary	Annually
Cold Water Services	Check temperatures at sentinel taps (typically those nearest to and furthest from the cold tank but may also include other key locations on long branches to zones or floor levels). These outlets should be below 20 °C within two minutes of running the cold tap.	Monthly

Service	Action to be taken	Frequency
	To identify any local heat gain, which might not be apparent after one minute, observe the thermometer reading during flushing	
	Take temperatures at a representative selection of other points to confirm they are below 20 °C to create a temperature profile of the whole system over a defined time period. Peak temperatures or any temperatures that are slow to fall should be an indicator of a localised problem	Representative selection of other sentinel outlets considered on a rotational basis to ensure the whole system is reaching satisfactory temperatures for legionella control
	Check thermal insulation to ensure it is intact and consider weather proofing where components are exposed to the outdoor environment	Annually
Showers and Spray Taps	Dismantle, clean and descale removable parts, heads, inserts and hoses where fitted	Quarterly or as indicated by the rate of fouling or other risk factors, e.g., areas with high risk patients
POU Filters	Record the service start date and lifespan or end date and Replace filters as recommended by the manufacturer (0.2 µm membrane POU filters should be used primarily as a temporary control measure while a permanent safe engineering solution is developed, although long-term use of such filters may be needed in some healthcare situations)	According to manufacturer's guidelines
Base Exchange Softeners	Visually check the salt levels and top up salt, if required. Undertake a hardness check to confirm operation of the softener	Weekly, but depends on the size of the vessel and the rate of salt consumption
	Service and disinfect	Annually, or according to manufacturer's guidelines
Multiple Use Filters	Backwash and regenerate as specified by the manufacturer	According to manufacturer's guidelines
Infrequently used outlets	Consideration should be given to removing infrequently used showers, taps and any associated equipment that uses water. If removed, any redundant supply pipework should be cut back as far as possible to a common supply (e.g., to the recirculating pipework or the pipework supplying a more frequently used upstream fitting) but preferably by removing the feeding 'T'.	Weekly, or as indicated by the risk assessment
	Infrequently used equipment within a water system (i.e., not used for a	

Service	Action to be taken	Frequency
	<p>period equal to or greater than seven days) should be included on the flushing regime. Flush the outlets until the temperature at the outlet stabilises and is comparable to supply water and purge to drain.</p> <p>Regularly use the outlets to minimise the risk from microbial growth in the peripheral parts of the water system, sustain and log this procedure once started. For high risk populations, e.g., healthcare and care homes, more frequent flushing may be required as indicated by the risk assessment.</p>	
TMVs	<p>Risk assess whether the TMV fitting is required, and if not, remove.</p> <p>Where needed, inspect, clean, descale and disinfect any strainers or filters associated with TMVs</p> <p>To maintain protection against scald risk, TMVs require regular routine maintenance carried out by competent persons in accordance with the manufacturer's instructions. There is further information in paragraphs 2.152- 2.168</p>	Annually or on a frequency defined by the risk assessment, taking account of any manufacturer's recommendations
Expansion Vessels	Where practical, flush through and purge to drain. Bladders should be changed according to the manufacturer's guidelines or as indicated by the risk assessment	Monthly-six monthly, as indicated by the risk assessment

Record Keeping

For our commercial premises the Association shall maintain site specific records of the management of legionella; these records shall be held on site. Each site record shall include the following information:

- Policy and Legionella Management Plan; Live Risk Assessment. Copy of historic Risk Assessments, Schematic of system.
- Details and schedule of maintenance visits; Details and schedule of monitoring and sampling; Details of responsible person and parties; Results of monitoring, samples and testing.

All records should be kept for a minimum of 5 years.

Water Systems Design

Where the Association has commissioned the design or construction of water systems, whether in domestic or commercial properties, these works should be completed to minimise the colonisation and growth of legionella bacteria within the water system. The systems must be designed and installed in accordance with:

- Construction Design and Management Regulation 2015 Scottish Water Byelaws 2004. Scottish Building Regulations
- BS EN 806 (Parts 1-5) Specifications for Installations inside buildings conveying water for human consumption.
- BS 8558 Guide to the design, installation, testing and maintenance of services supplying water for domestic use within buildings and their curtilages.
- CIBSE Guide G Public Health and Plumbing Engineering

Commissioning

In terms of the management of legionella, the period of time from installation and filling through to commissioning is potentially the most hazardous period for the development of legionella bacteria. Prior to commissioning a risk assessment should be undertaken to identify the potential for stagnation in the system which could lead to the development of microbiological growth.

As a minimum all new water systems should be flushed out and disinfected. The commissioning process should be adjusted according to the type of system and the length of time between commissioning and occupation.

Long Term Void Properties

Where a property is taken out of occupation for prolonged period of times, it should be managed to prevent microbiological growth. In general, we should aim to leave systems filled with water. By leaving the systems filled with water we remove the risk of pockets of water left in drained down system from developing biofilm and help to prevent failures in the systems associated with drying out.

When the property is to be re-occupied, these water systems should be re-commissioned as if they were new; including flushing, cleaned and disinfection; before being returned to use.

Shared Premises

Where the situation arises that the Association owns or is operating within shared premises, it must be established where the responsibilities lies in terms of the Control of Legionella.

The Association should within the terms of any lease/tenancy or contract, identify clearly who the duty holder shall be and the extent of that responsibility.

Action to be taken if there is an outbreak of Legionellosis

In Scotland under the Public Health (Notification of Infectious Diseases) Regulation 2010 human diagnostic laboratories must notify Health Protection Scotland of microbiologically confirmed cases of Legionnaires' disease.

An outbreak is defined as two or more cases where the onset of illness is closely linked in time and where there is epidemiological evidence of a common source of infection, with or without microbiological evidence.

Where an outbreak is identified the Local Authority shall implement their infectious diseases incident plan to investigate the outbreak, the Local Authority shall appoint the Proper Officer whose primary purpose is to protect public health.

Where an outbreak has occurred from suspected infringements of the regulations, then the enforcing authority shall investigate and take appropriate enforcing action. Enforcing authority shall be HSE or Local Authority Environmental Health Officers.

If an outbreak was identified that involved CVHA properties, the Association would liaise with and assist the Local Authority investigation. Where a water system in the ownership of CVHA was implicated within the outbreak investigation, immediate emergency treatment works of that system would be instructed.

Monitoring and Review

There should be constant monitoring of compliance against the Legionella Management Plan to ensure that all mitigation measures are being implemented. The Plan should also be updated to account for new risk, and/or updated mitigation measures.

The Legionella Management Plan should be reviewed in its entirety in line with the review of the Legionella Management Policy, or where Legislative, Regulatory or Best Practice changes/updates occur.

Policy Change History

Version No:	Substantive Change	Author of Change	Approval	Date	Website
1.0	Formatting sorted; new front cover & version history applied.	A Cavinue		12/07/23	Y