

STROUD DISTRICT COUNCIL

HOUSING COMMITTEE

TUESDAY, 6 FEBRUARY 2024

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| Report Title | Legionella Policy | | | |
| Purpose of Report | Following the introduction of new reporting requirements from the Social Housing Regulator a new Legionella Policy and Management Plan has been written to ensure compliance with the updated reporting requirements and standards. This is being presented to Housing Committee as the Governing body for the Housing Service. | | | |
| Decision(s) | The Committee RESOLVES to: 1. Adopt the Legionella Policy and Legionella Management Plan; 2. Agree to the amendments and updates; and 3. Agree a review date. | | | |
| Consultation and Feedback | Consultation with SLT, Technical Compliance Officer, Heating and Electrical Manager, Strategic Head of Housing, & SMS Environmental who provide our legionella risk assessment and planned maintenance services. Consultation has also taken place with Tenant Representatives. | | | |
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| Options | To implement the revised policy. By not implementing this policy legionella risks may heighten and there would be a risk of non-conformance with the Social Housing Regulators requirements. | | | |
| Background Papers | N/A | | | |
| Appendices | Appendix A – Legionella Policy Appendix B – Legionella Management Plan Appendix C – CHS 14 Legionella Control | | | |
| Implications (further details at the end of the report) | Financial | Legal | Equality | Environmental |
| | No | Yes | No | No |

1. Introduction / Background

- 1.1 Stroud District Council Housing Services has a duty to manage the risk of Legionella bacteria in its water systems. Modifications to the policy requirements of this duty has been highlighted in reporting requirements introductions from the Social Housing Regulator.
- 1.2 This has required us to define our legal duty and name Responsible People within the organisation specifically in relation to social housing.
- 1.3 Stroud District Council has maintained a Legionella Policy and Management Plan historically however this policy is a new iteration to ensure evidential compliance with the

Social Housing Regulator. It is to be considered in conjunction with the Corporate Legionella control document CHS14.

2. Main Points

2.1 The main points of the policy consist of:

- Identification, assessment and regular review of risks
 - **Premises with highly vulnerable occupants** - An initial risk assessment is undertaken and refreshed bi annually (every 2 years). A review of the risk assessment will be undertaken annually and will take into account management information taken from maintenance records.
 - **General needs Domestic Premises** – Housing Services will aim to risk assess its general needs stock by architype. Desktop review of the risk assessment will be undertaken every two years or if there is reason to believe the assessment may no longer be valid.
 - **Non-scheduled reviews** of risk assessments will take place whenever there is reason to believe the latest risk assessment may no longer be valid e.g. due to a change of building use, major refurbishment work.
 - **Information for tenants** will be given on sign up in the form of an information sheet. The SDC website is in the process of being updated to ensure that this information is easily accessed online also. Legionella will also form part of the safety topics which will be communicated to tenants in safety campaigns going forward.

- Preparation of a written scheme to reduce, eliminate or control the risks identified. The 'Scheme of Control will include':
 - A detailed schematic drawing of the hot and cold water system;
 - A description of the correct and safe operation of the system;
 - Precautions to be taken;
 - The required routine water hygiene tasks and checks for the building to ensure the system is functioning efficiently (These will be listed within the Water Hygiene Site Log Book);
 - Remedial action to be taken in the event of the current scheme being shown not to be effective;
 - Routine water testing/monitoring where identified for the system e.g. legionella bacteria, other general bacterial testing, e.g. Total Viable Count (TVC) etc.

- Implementation and management of the written scheme by appointing adequately trained people who have managerial responsibility.
 - Training will be given to Responsible Persons and relevant operational staff to ensure that they can discharge their duties effectively.
 - Responsible Persons will be named by job role within the management plan.

3. Conclusion

- 3.1 This policy reinforces the Council's commitment to the safety of its tenants, employees and the public. It enables the council to meet the requirements of the Social Housing Regulator in addition to its duties under the Health and Safety at Work etc. Act 1974 and other relevant legislation.

4. Implications

4.1 Financial Implications

There are no financial implication arising directly from this report however where Legionella risk assessments are being expanded to cover general needs properties, there may be an increase in expenditure in the future.

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4.2 Legal Implications

The legal background is set out in the body of the report.

Having a Management Plan and adhering to the policy will ensure the Authority has a process in place for assessment of any risks and a programme for managing and addressing any risk. This will in turn assist with ensuring that the Authority meets any statutory requirements and avoids action being taken against the Authority by the Social Housing Regulator.

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4.3 Equality Implications

There are not any specific changes to service delivery proposed within this decision

4.4 Environmental Implications

There are no significant implications within this category