



Legionella Management Policy

January 2024

Housing Services

Stroud District Council
Ebley Mill
Stroud
GL5 4UB

Email: customer.services@stroud.gov.uk
Website: <https://www.stroud.gov.uk/>
Telephone: 01453 766321

Document Responsibility		
Name	Document title	Service
Name of person responsible for document	Title of document	Service area e.g. Policy & Governance

Document Version Control			
Date	Version	Issued by	Summary of changes
Date version created	Version number e.g. 1.0 or 1.1 for minor revisions	Name of person issuing updated version	Summary of changes e.g. First draft or updated following feedback from xxx

Policy Review			
Updating frequency	Review date	Person responsible	Service
Frequency with which the document should be reviewed e.g. 3 years unless required earlier	Date document should be reviewed e.g. September 2024	Use job title rather than name in case of personnel changes	Service area e.g. Policy & Governance

Document Review and Approvals		
Name	Action	Date
Name of staff member/committee that has reviewed and/or approved the policy	E.g. consulted, reviewed, approved	Date of review or approval

1 INTRODUCTION

1.1 Purpose and scope

- a) Legionella bacteria can cause Legionnaires' disease, a group of pneumonia-like illnesses which can prove potentially fatal to those at higher risk including those over 50, smokers and heavy drinkers, people with diabetes, chronic respiratory, heart, liver or kidney disease, or whose immune system is impaired.
- b) For Legionnaires' disease to develop, the Legionella bacteria (specifically Legionella pneumophila) is water borne and is usually transferred by inhalation of water droplets. Under normal conditions, the disease cannot be passed from one person to another.
- c) Housing Services acknowledges the health hazards associated with exposure to Legionella bacteria and will minimise exposure through the use of control measures and work methods in relation to the management of water systems as detailed in the HSE Approved Code of Practice L8.
- d) This policy should be read in conjunction with the Legionella Management procedure plan and the corporate Legionella Control Document [CHS 14](#)
- e) The purpose of the policy is to set out how Housing Services will manage Legionella bacteria to reduce the risk of potential exposure as part of its duties under the Health & Safety at Work Act 1974 and all relevant guidance as detailed in section 3.1 for all properties where we have a duty to manage.
- f) The policy is intended to ensure that Housing Services provides safe housing conditions for all residents and safe working environments for all staff and contractors.

1.2 Terms and definitions

Term	Definition
Legionella	A potentially dangerous type of bacteria when inhaled with water vapor. Bacterium grows best in warm, nutrient rich water
Legionella Risk Assessment	A specific risk assessment carried out to determine the risk level of Legionella proliferation, and exposure from a specific water system
H.S.E	The Health and Safety Executive (HSE) is Britain's national regulator for workplace health and safety. It prevents work-related death, injury and ill health. HSE is an executive non-departmental public body, sponsored by the Department for Work and Pensions.
Duty Holder and Responsible Person (RP)	The duty holder should specifically appoint a competent person or persons to take day-to-day responsibility for controlling any

	identified risk from legionella bacteria, known as the 'responsible person'. It is important for the appointed responsible person to have sufficient authority, competence and knowledge of the installation to ensure that all operational procedures are carried out effectively and in a timely way.
Maintenance	Cleaning, repair, tests etc. required to minimise bacterial growth

2 LEGISLATION

- a) The policy conforms to the four main statutes which apply to the control of Legionella bacteria:
- Health & Safety at Work Act 1974
 - Management of Health & Safety Regulations 1999
 - Control of Substances Hazardous to Health Regulations (COSHH 2002)
 - Approved Code of Practice L8 and Guidance HSG274.
- b) In the event of an incident, as defined by the HSE, a Reporting of Injuries, Diseases and Dangerous Occurrence Regulation (RIDDOR) form will be completed and sent to the Health & Safety Executive (HSE) by Housing Services Compliance and Assurance Manager.

3 KEY POINTS OF POLICY

- a) The Health & Safety at Work Act 1974 and COSHH require employers to conduct their work in such a way that their employees will not be exposed to health and safety risks and provide information to other people about their workplace, which might affect their health and safety. Housing Services will comply with its duties under the Act by:
- Effectively reducing associated risks to the lowest level reasonably practicable for all customers, visitors, staff and contractors
 - Reducing to the lowest reasonably practicable level the spread of Legionella disease from any Housing Services related premises.
- b) Housing services will comply with the Management of Health & Safety Regulations 1999 by ensuring that a monitored programme of adequate controls is in place. This will be implemented through:
- Identification, assessment, and regular review of risks
 - Preparation of a written scheme to reduce, eliminate or control the risks identified

- Implementation and management of the written scheme by appointing adequately trained people who have managerial responsibility
 - Maintaining all relevant records and monitoring controls
- c) The risk assessment programme will be prioritised according to the vulnerability of service users and the water systems likely to present the highest risks.
- d) Housing Services will also comply with the Control of Substances Hazardous to Health Regulations 2002 by taking reasonable steps to safeguard people from hazards associated with water supplies, particularly waterborne bacteria.
- e) Housing Services will comply with the duties of the Approved Code of Practice L8 and Guidance HSG274 by:
- Undertaking an initial risk assessment to identify the risk level of each property. This will identify whether the possibility exists of conditions suitable and liable to facilitate the growth of legionella bacteria and this will determine where a site based water risk assessment is required.
 - This site based risk assessment will determine for each property the inspection frequency, remedial works and management actions required.
 - Only suitably competent and experienced legionella/water treatment persons will be permitted to carry out risk assessments and remedial works.

4 TRAINING

- a) Where significant risk has been identified, and control measures need to be in place, Housing Services will ensure suitable and sufficient training of staff to support them with their responsibilities in water hygiene e.g. maintenance operatives and scheme support staff.
- b) Managers responsible for premises must ensure the Competent Person nominated to manage/perform temperature checks etc. fully understands their responsibilities and relevant procedures.
- c) Employees will receive suitable instruction and awareness training appropriate to their job role and place of work. A training record will be kept. Competent persons will provide awareness training that meets the requirements of L8.

5 MONITORING AND REPORTING

- a) The following will be monitored and reported, as required, to the Management team:
- RIDDOR notifiable incidents
 - Number of properties where:
 - A risk assessment is required
 - A risk assessment has been completed
 - Remedial works have been completed
 - Management procedures currently operate

6 RELATED DOCUMENTS

- a) Legionella Control Document [CHS 14](#)
- b) [Legionella Management Plan](#)
- c) HSE [Approved Code of Practice L8](#)