

# Albyn Group Legionella Policy

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<b>Version Control</b>	<b>Date of Current Review</b>	<b>Date of Next Review</b>	<b>Reviewed by</b>
1.0	November 2021	November 2024	Morag Beers

<b>Corporate Fit</b>	
Internal Management Plan	
Risk Register	
Business Plan	
Regulatory Standards	
Equalities Strategy	
Legislation	

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## 1.0 Introduction

- 1.1 The aim of the Legionella Policy is to ensure an effective inspection, maintenance, and management regime of all water systems within premises owned and or occupied by Albyn Group is in place.
- 1.2 The implementation of the policy is to ensure that the risk of exposure to Legionella within an Albyn property is assessed and controlled and so ensure the health and safety of those who live and work in Albyn properties.
- 1.3 Legionella bacteria occurs naturally and can be found in any water, such as rivers and ponds. The bacteria enter manmade systems from the mains water supplies into buildings. There is very little that can be done to prevent the low numbers of bacteria entering a building's systems from the mains supply. Effective management of water systems within buildings is required to minimise risk and prevent growth of the bacteria once in the premises. The most common sources of Legionella occur in man-made water systems such as cooling towers, evaporative condensers, spray apparatus, showers, hot- and cold-water systems.
- 1.4 Legionella bacteria can cause infections in humans, including Legionnaires' Disease, Pontiac Fever and Lochgoilhead Fever. Infections caused by Legionella bacteria are known as a 'legionellosis'. The bacteria are normally contained within the fine water droplets (aerosols) that may occur when operating, amongst other things, a shower, a water spray apparatus or running a tap. The infections are only contracted by deep inhalation of the aerosols that contain the Legionella bacteria.  
  
The Pontiac and Lochgoilhead Fevers are non-fatal, flu-like illnesses. Legionnaires' Disease though has the potential to affect a wide range of people. The risk increases with age but some people are at higher risk, including: persons over 45 years of age; smokers; heavy drinkers; people suffering from chronic respiratory or kidney disease; and anyone with an impaired immune system.
- 1.5 Legionella bacteria have been found in water systems with temperatures ranging from 6°C to 60°C. They grow best between 20°C and 45°C; will be killed above 60°C; will survive but not grow at temperatures below 20°C. The nutrients required for Legionella bacteria to grow are found in water systems: other water organisms, sludge, scale and sediment. Iron is required for growth, which is often provided by corrosion. Given these circumstances, there is the risk that Legionella bacteria will grow in water that is stagnant between 20°C and 45°C with a supply of nutrients. This can occur in both homes and workplaces.

## **2.0 Legal and Regulatory Framework**

2.1 Albyn will comply with all relevant in terms of water hygiene and control of Legionella. There is no specific piece of legislation that covers management of Legionella. The statutes and regulations that relate include:

- The Control of Substances Hazardous to Health Regulations (2002)
- The Health & Safety at Work Act 1974
- The Control of Legionella in Water Systems in Water Systems 4<sup>th</sup> Edition 2013
- Legionnaires' Disease (HSG 274) Technical Guidance
- Legionnaires' Disease (IACL 27) A Guide to Employers
- Scottish Social Housing Charter
- Scottish Housing Regulator's Regulatory Framework
- Scottish Housing Quality Standard
- Building Regulations

Failure to comply could result in improvement or prohibition notices being served or eventual prosecution.

## **3.0 Aims and Objectives**

3.1 The Aims and Objectives of this Policy are:

- To set out a framework that will enable Albyn Group to understand, mitigate and manage the risks from Legionella in our homes and workplaces
- To establish the requirement for procedures to be created and followed to ensure the risks are adequately managed
- To ensure the risk in our homes and workplaces is managed in line with statutory requirements and good practice
- To raise awareness of the risks associated with Legionella bacteria with all staff and customers
- To establish an approach for assessing, controlling and monitoring the risk of Legionella related illness within Albyn properties

## **4.0 Related Policies and Strategies**

4.1 This policy should be read in conjunction with other policies, including:

- Void Management Policy
- Learning and Development Policy
- Health and Safety Policy Statement
- Construction Design and Management Policy
- Property Maintenance Policy

## **5.0 Scope**

5.1 This policy covers all homes, workplaces, buildings and development sites owned, occupied or managed by Albyn Group.

## 6.0 Definitions

- 6.1 **Albyn Group:** Throughout this policy, Albyn and Albyn Group means Albyn Housing Society and its subsidiary companies.
- 6.2 **Responsible Person:** This is the person who has overall responsibility for ensuring and maintaining Legionella safety procedures. Different areas of work will have different Responsible Persons overseeing them.
- 6.3 **Contractors:** Only contractors who are registered with an appropriate body such as the Legionella Control Associates will be engaged by Albyn. Contractors will need to demonstrate competence in Legionella safety, experience in the field and have no enforcement or legal actions against them for non-compliance.

## 7.0 Roles and Responsibilities

- 7.1 **Responsible Persons:** Albyn Group will appoint Responsible Persons to ensure we manage Legionella risk
- 7.2 The CEO has overall responsibility for Health and Safety at Albyn Group.
- The CEO is the Responsible Person for the purpose of:
- Reporting incidents of Legionella bacteria related illnesses to the Regulator if deemed a Notable Event
- 7.3 The following have responsibility for the day-to-day management of specific parts of this policy:
- Director of Property Services
  - Director of Customer Services
  - Head of HR and Organisational Development
  - Health and Safety Manager
- 7.4 The Director Property Services is the Responsible Person for the purposes of creating and following the management plan and corporate procedures together with the Health & Safety Manager in relation to:
- Development of new homes
  - Newly acquired homes
  - Mid-Market rental portfolio
  - Albyn workplaces and other corporate premises
  - Communal areas of homes
  - Reporting outbreaks of Legionnaires Disease to, amongst others as required, appropriate external bodies, the Director of Customer Services, SHSE Committee and the CEO
- 7.5 The Director of Customer Services is the Responsible Person for the purposes of following the management plan in relation to:

- Raising awareness with customers of good practice in relation to minimising the risk of Legionella bacteria within their homes
- Reporting any instances of reports of Legionella related events in Albyn homes to, amongst others as required, appropriate external bodies, the Director of Customer Services, SHSE Committee and the CEO

7.6 The Head of HR is the Responsible Person for the purpose of following the management plan in relation to:

- Supporting training and awareness of Legionella for all staff

The Health and Safety Manager for the purpose of:

- Creating the management plan and required procedures together with the Director of Property Services to ensure that all statutory requirements are met

## 8.0 Policy Statement

### 8.1 We will:

- Identify Responsible Persons
- Identify and assess sources of risk of Legionella in our properties
- Prepare a management plan and procedures for preventing and controlling risk
- Implement the plan manage the procedures
- Maintain accurate records of assessments and management
- Ensure that staff working on issues relating to Legionella risk are appropriately trained, and that contractors engaged are appropriately qualified and experienced.
- Provide clear information to customers to help them reduce the risk of exposure to Legionella bacteria in their homes

### 8.2 Actions to be taken in the event of an outbreak of Legionella related illness:

- An outbreak is defined as a two or more cases of illnesses closely linked int time with a common source of infection
- Any outbreak is to be reported to appropriate local authority and health service bodies
- Albyn to work as required with external bodies to ensure that the source of the outbreak is established, managed and further risk eliminated
- Any occurrence of Legionnaires disease is to be reported under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR)
- The CEO and SHSE Committee are to be advised
- If deemed appropriate, the outbreak should be reported to the Regulator as a Notifiable Event.

## **9.0 Performance, Monitoring and Reporting**

- 9.1 Any events relating to outbreaks of illness related to the presence of the Legionella bacteria will be reported to the Staff, Health and Safety, and Environmental (SHSE) Committee in the Health and Safety Manager's Report.
- 9.2 The preparation of the scheme for identifying and managing sources of Legionella bacteria will be presented to SHSE Committee.

## **10.0 Complaints**

- 10.1 Any complaints from customers about the Legionella policy or associated procedures will be dealt with through the normal customer complaints policy.
- 10.2 Any complaints from staff regarding this policy or associated procedures will be dealt with under the Whistleblowing Policy or Grievance Policy as appropriate.

## **11.0 Equal Opportunities**

- 11.1 Albyn will ensure there is a consistent approach in promoting equality and diversity across all areas and this policy shall be administered in accordance with those principles.

## **12.0 Policy Review**

- 12.1 This policy will be reviewed on the appointment of a Health and Safety Manager, or within 3 years, whichever is sooner.