

# Legionella Management Policy and Management Plan

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Last Review: November 2021 Next Review: November 2024 Policy Number: M10

### **Our Vision, Our Mission, Our Values**

#### **Our Vision**

Elderpark Housing will lead the way in delivering outstanding customer services and great places to live.

#### **Our Mission**

To provide quality, affordable homes and excellent services which place a focus on our customers and enhancing our communities.

#### **Our Values**



#### **Equality and Diversity Statement**

Elderpark Housing are committed to ensuring people or communities do not face discrimination or social exclusion due to any of the following protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex or sexual orientation.

This document complies with our Equality and Diversity Policy.

We will regularly review this Policy and consider any equalities implications taking the necessary action to address any inequalities (either directly or indirectly) that result from the implementation of this Policy.

## **Executive Summary**

#### **Policy Author**

This Policy has been developed by the Director of Maintenance Services who has responsibility for the effective implementation and timely review of the Policy.

#### **Purpose of the Policy**

Elderpark Housing has a duty of care to ensure that so far as reasonably practicable it manages and controls the risks from legionella bacteria and maintains water quality in water systems within properties owned by the Association.

This Legionella Policy will be implemented throughout all premises owned or managed by Elderpark Housing and its implementation will be encouraged throughout any premises which are used by its staff.

#### **Aims and Objectives of the Policy**

The overall aim of this policy is to set out how Elderpark Housing will manage Legionella, reducing the risks from legionella and from potential outbreaks which could lead to residents and staff being exposed.

The key objectives are to ensure that Committee, staff and residents are aware of their responsibilities in relation to the management of Legionella and to eliminating or reduce the risk, as far as is reasonably practicable, of residents, visitors, staff and contractors contracting Legionella.

Elderpark Housing will establish procedures which are clear to everyone involved in the elimination or reduction of the risk from legionella bacteria; this includes the assignment of responsibilities to specific personnel within the Association for ensuring the Policy and Procedures are implemented and adhered to.

#### **Legislative and Regulatory Compliance**

This policy sets out Elderpark HA's responsibilities to comply with the relevant legislation and associated regulatory requirements with regards to its' duty to manage and control Legionella. The principal legislation in this area is as follows:

- Health and Safety at Work act 1974
- The Control of Substances Hazardous to Health Regulations 2002
- The Management of Health and Safety at Work Regulations 1999
- Approved Code of Practice (ACoP) and Guidance L8 2013 (4th Edition) Legionnaire's Disease - The control of legionella bacteria in water systems
- Reporting of Injuries Diseases and Dangerous Occurrences Regulations 2013
- HSG274: Legionnaires disease. Part 2: The control of legionella bacteria in hot and cold water systems.

Water Supply (Water Fittings) Regulations 1999;

The Scottish Housing Regulator (SHR) Regulatory Framework sets out what Landlords must do to ensure that they meet all of their legal duties and responsibilities including adherence to relevant guidance and the requirement of other regulators. SHR requirement relating to Annual Assurance and legal obligations are relevant to this policy and set out in chapter 3 of the framework:

'There is a requirement to notify the SHR of any tenant and resident matters which have been reported to, or are being investigated by, the Health and Safety Executive, or reports from regulatory or statutory authorities, or insurance providers, relating to safety concerns.'

'Notify us (SHR) of any tenant and resident matters which have been reported to, or are being investigated by, the Health & Safety Executive or reports from regulatory or statutory authorities, or insurance providers, relating to safety concerns.'

#### **Equalities**

An Equalities Impact Assessment has been carried out and attached to this Policy. This has identified that as this policy relates to properties and not tenants and/or other residents. As such it is deemed to not have any equalities impact. The policy aims to mitigate risks to its tenants, staff, contractors and the general public from the hazards that legionella may pose legionella is present in water under the optimum temperature, conditions and if dispersed via a spray effect.

#### **Privacy**

Record keeping for the purposes of this policy relate to the contracts that are in place and risk assessments and associated works, including records of temperature checks carried out. All data will be held in line with GDPR requirements. This Policy is written to be open and transparent in line with FOISA. A GDPR Impact Assessment has been carried out and attached to this Policy.

#### **Related Policies**

Policy Title	Location
Asset Management Policy	To be reviewed 2021
Planned & Cyclical maintenance policy	V:\Elderpark Policy Suite\Maintenance
	Policies\M3 Planned and Cyclical
	Maintenance Policy.pdf
Reactive Maintenance Policy	V:\Elderpark Policy Suite\Maintenance
	Policies\M4 Reactive Maintenance
	Policy.pdf
Privacy policy	V:\Elderpark Policy Suite\IT Policies\IT1
	Privacy Policy.pdf
Freedom of Information Policy	V:\Elderpark Policy Suite\Governance
	Policies\G29 FOI and EI Policy.pdf

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#### 1 Introduction

1.1 Elderpark Housing was established in 1975 and currently owns approximately 1340 homes with the majority being in Central Govan although we also have a number of properties within the areas of Ibrox, Kinning Park and Cessnock.

In addition to being a landlord we provide a factoring service to approximately 250 owners. The vast majority of our homes are tenement flats which account for over 80% of the stock the Association provides for rent. The association also owns commercial properties and a community centre. All of our stock and other non-domestic properties fall under the scope of this Legionella policy

1.2 The Association is a "not for profit" organisation, registered and regulated by the Scottish Housing Regulator and is governed by a voluntary Management Committee of up to 15 people and currently employ around 25 staff. Furthermore we are a registered Charity under the Rules of the Co-operative and Community Benefit Societies Act 2014.

#### 2 Policy aims and objectives

2.1 The overall aim of this Policy and Management Plan is to set out how Elderpark Housing will achieve its obligations with regards to the management of Legionella, including eliminating or reducing risks to as low a level as reasonably practicable and reducing the potential risk of an outbreak where residents, staff contractors and the general public are exposed to legionella bacteria.

The Association will establish procedures which are clear to everyone involved with the elimination or reduction of the risks from legionella bacteria; this includes the assignment of responsibilities to specific personnel within the Association for ensuring the Policy and Management Procedures are adhered to.

- 2.2 The main objective is to ensure that Committee, staff and residents are aware of their responsibilities in relation to the management of Legionella, and to eliminate or reduce the risk of residents, visitors, staff and contractors contracting Legionella
- 2.3 To achieve this objective, a suitable and sufficient risk assessment is conducted within Elderpark's properties with the aim of identifying and assessing the risk of exposure to legionella bacteria from those water systems present.
- 2.4 If the assessment shows there is reasonably foreseeable risk of exposure and it is reasonably practicable to prevent or control the risk, the Responsible Person/s will instruct and supervise the implementation of the required precautions and necessary control measures.

#### 3 Equal Opportunities

3.1 We will not unfairly discriminate against any person within the protected characteristic groups as contained within the Equality Act 2010. To ensure equal access to the information contained in this policy for all, we are happy to provide copies in Braille, in

larger print, translated into other languages or on tape to you or anybody that you know upon request and where practicable.

- 3.2 The Association through the Legionella Management Policy, will act to provide services in a manner that encourages equal opportunities and complies will all relevant equal opportunities requirements.
- As with all Association policies and practices, the Association will adhere to Outcome 1 of the Scottish Social Housing Charter (Equalities):
   'Social Landlords perform in all aspects of their housing services so that every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services'.

#### 4 Legal and Good Practice Framework

- 4.1 The Health & Safety at Work etc Act 1974 (HASAWA) requires all employers 'to ensure, so far as is reasonably practicable, the health, safety, and welfare at work of all their employees'.
- 4.2 The Management of Health and Safety at Work Regulations 1999 specify in more detail the general duties of the HASAWA 1974 act with regard to safety management requiring all employers to undertake a 'suitable and sufficient' assessment of the risks to the health and safety of their employees and others who may be affected by their work activities and environment. This includes the risks arising from the Control of Substances Hazardous to Health (COSHH).
- 4.3 The COSHH Regulations 2002 place a duty on employers to protect their employees by undertaking an assessment of the risks to health arising from hazardous substances in the workplace. This includes:
  - preventing or controlling exposure;
  - maintaining, examining and testing control measures;
  - monitoring exposure and providing health surveillance where appropriate;
  - providing information, instruction and training; and
  - ensuring arrangements are in place to deal with accidents, incidents, outbreaks and emergencies.
- 4.4 The Scottish Social Housing Charter sets the standards and outcomes that tenants and other customers who use our services can expect. The first charter came into effect on the 1st April 2012 and was reviewed during 2016. The revised charter was approved by Parliament and has been in effect since the 1st April 2017.

The relevant Outcomes associated to this policy are:

- Outcome 1 (Equalities) as section 3.0 (Equal Opportunities) in this policy
- Outcome 2 (Communication): 'Tenants and other customers find it easy to Communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the services it provides'.

- 4.5 To comply with its legal duties the Association will:
  - Identify and assess sources of risk
  - Implement a programme of regular checks and monitoring of its water systems
  - Ensure suitable and sufficient resources are available
  - Implement, monitor and manage all control measures identified
  - Keep records of all such measures
  - Nominate employees and others with responsibility for implementing this policy
  - Review this policy annually, or when legislation changes or amendments are introduced.

#### **5** Policy Context

#### Legionella and legionnaires disease

- 5.1 Legionella pneumophila is the bacterium responsible for a group of pneumonia-type diseases collectively termed 'Legionellosis'. This is known as Legionnaires Disease. The diseases can be fatal or permanently debilitating..
- 5.2 Legionnaires' Disease is usually contracted by inhaling the legionella bacteria in aerosol form, such as airborne droplets of water created by a shower, fire hose, spray tap or even a standard tap.
- 5.3 The Legionella bacteria is widespread in nature. It mainly lives in water, for example ponds, where it does not usually cause problems. Outbreaks occur from purpose-built water systems where temperatures are warm enough to encourage growth of the bacteria, e.g. in cooling towers, evaporative condensers and whirlpool spas and from hot and cold water systems.
- 5.4 Water temperatures in the range of 20 45 degrees C. favour the growth of Legionella in water systems. At temperatures below 20 degrees C. the bacteria will lie dormant until more favourable conditions occur, at which point they begin to multiply. It will not survive above 60 degrees C therefore to kill the bacteria the water must be heated above 60 degrees C. In addition to temperature control, other methods of protection include ionisation, UV light, chlorine dioxide, ozone treatment or thermal disinfection
- 5.5 A supply of nutrients is also necessary for the bacteria to thrive. These can commonly be found in water systems that are not routinely inspected or cleaned and are ageing. Nutrients include other bacteria amoebae and algae. Sediment, scale, sludge and biofilms may help to harbour Legionella; therefore it is prudent not to allow these to build up.
- 5.6 The main risk to residents is exposure to an aerosol of Legionella infected water. Certain groups of people are known to be at higher risk of contracting Legionnaires' disease. These include immune-suppressed people e.g. cancer patients, those with chronic kidney disease, those with chronic lung disease, smokers, diabetics and alcoholics. There is a greater tendency for men to catch the disease than women,

especially those over 45 years of age. (Ref: New ACOP L8 2013 Legionnaires' disease). The disease cannot be passed from one person to another.

5.7 The Association is committed to conducting our business in a way that protects the health, safety and welfare of its employees, tenants, other residents of Elderpark Housing, contractors and visitors.

#### 6 Legislation and Regulation relating to legionella

#### 6.1 Health and Safety at Work Act etc. 1974

Under this Act, employers must conduct their work so their employees will not be exposed to health and safety risks. Employers must also provide information to other people about their workplace which might affect their health and safety. Thus, there is a requirement to pass information regarding legionella to employees and contractors when working in our premises/properties. We shall also notify tenants of basic and effective legionella controls for works they carry out within their homes.

#### 6.2 Management of Health and Safety at Work Regulations 1999

These regulations require employers to assess health and safety risks to employees and third parties, such as residents who may be affected by our activities and make suitable arrangements to protect them. The regulations stipulate the need to:

- Carry out a suitable and sufficient assessment of the risks for all work activities
- Record the assessments
- Implement the necessary control measure
- Appoint competent persons
- Set up emergency procedures
- Provide information and training
- Work with others sharing the workplace

## 6.3 The Control of Substances Hazardous to Health (COSHH) Regulations 2002 (as amended):

Legionella pneumophila is classed as a biological agent by the HSE and is listed as a Class 2 Hazard under these regulations. It is a statutory duty to prevent or control exposure to biological agents.

The COSHH Regulations 2002 place a duty on employers to protect their employees by undertaking an assessment of the risks to health arising from hazardous substances in the workplace. This includes:

- preventing or controlling exposure;
- maintaining, examining and testing control measures;
- monitoring exposure and providing health surveillance where appropriate;
- providing information, instruction and training; and
- ensuring arrangements are in place to deal with accidents, incidents and emergencies.

#### 6.4 Reporting of Injuries, Diseases or Dangerous Occurrences (RIDDOR) 2013

All employees and contractors of Elderpark Housing are duty bound to report an uncontrolled release to the Health & Safety Executive of a substance that could be harmful to people under the requirements covered by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR). An outbreak of Legionnaire's disease is reportable in accordance with these regulations.

#### 7 Responsibilities for implementation

- 7.1 Elderpark's Chief Executive is the Duty Holder for the management of Legionella for all properties owned and managed by the association. The Chief Executive needs to ensure that there is sufficient resources, training and experience within the staff team to manage the legionella control on his behalf.
- 7.2 Elderpark Management Committee are responsible for:
  - overseeing all of the activities undertaken by the Duty holder;
  - defining and ensuring compliance with the Group's values and objectives; and
  - agreeing the Duty Holders strategic direction and making sure that policies and procedures are in place to achieve those objectives.
- 7.3 Director of Maintenance Services is the Responsible Person responsible for:
  - monitoring and reviewing the actions arising from water hygiene risk assessments
  - ensuring that all actions identified are undertaken within appropriate timescales and that necessary remedial works to installed systems are completed.
  - confirming completion of all such identified works/actions to the Chief Executive officer and Elderpark's Management Committee.
- 7.4 Maintenance Services Manager is the Depute Responsible Person who will undertake the tasks listed above for the Responsible Person (DMS) in their absence.
- 7.5 Bradley Environmental Consultants Limited are Elderpark's externally appointed Water Hygiene consultants. Bradley Environmental Consultants will carry out the risk assessments and provide recommendations that mitigate risks from legionella, to the Responsible Person (DMS).
- 7.6 Approved Appointed Water Hygiene Contractor The appointed Water Hygiene contractor will undertake remedial works to ensure that control measures are sustained in order to reduce the risk of a Legionella growth and outbreak.
- 7.7 All employees It is the responsibility of all employees to ensure that these policies and guidelines are followed and as such:
  - provide such assistance to their line manager as is necessary to ensure they are able to meet their responsibilities; and
  - report to their line manager immediately any safety hazard or defects relating to water systems, which they suspect or consider to be likely to endanger the safety of themselves or any other person.

- 7.8 Water Hygiene Specialist It is also important that where a contractor is appointed, that the Associations Water Hygiene consultant operates an audit plan to ensure that those designated to carry out control measures on behalf of Elderpark Housing
  - informed, instructed and trained
  - Assessed as to their competency
  - Accreditation is relevant, current and not expired

The contractor will be required to provide evidence of suitable training and competence for their staff, evidence of refresher training and be members of the Legionella Control Association which has additional competency requirements.

Although training is an essential element of ensuring competence, it should be viewed within the context of experience, knowledge and other personal qualities that are needed to work safely.

Competence is dependent on specific needs of individual installations and the nature of risk.

7.9 Appendix 3 provides a Legionella Management Organisational Structure.

#### 8 Risk Assessment process

- 8.1 A suitable and sufficient risk assessment of the water system must be undertaken to assess the risk of exposure to legionella by residents, employees and others who may be affected, for example, employees of other companies who share the premises, contractors, visitors and members of the public.
- 8.2 The risk assessment will include an assessment of pipe work to its storage point (both hot and cold), water storage tanks and the furthest outlet, pipe work to deliver water to the outlet (tap, shower, hose, toilet, etc.) and condition of the source of outlet.
- 8.3 Responsibility for water quality to the point of the town cold mains inlet to the premises is that of Scottish Water.
- 8.4 In conducting the assessment, the responsible person(s) must appoint an approved contractor, to support Elderpark in meeting their health and safety duties. The assessment must:
  - consider the individual nature of each site;
  - identify potential sources i.e. an asset register;
  - evaluate potential sources;
  - consider prevention of exposure to Legionella;
  - include the means of controlling any residual risk;
  - consider the factors affecting the risk such as:
  - the presence of Legionella;
  - the means of distributing aerosols;
  - the population that may be affected;
  - the location of the system;

- conditions for proliferation such as temperature, scale, sludge, corrosion, algae, organic matter, etc.; o the water supply quality;
- the possibility of contamination;
- normal and unusual operating conditions that are 'reasonably foreseeable'; and
- Contain a complete system schematic to include dead legs and parts used intermittently.
- 8.5 If the risk assessment concludes there is no reasonably foreseeable risk, or the risks are insignificant and are managed, the assessment is complete. Although no further action may be required at this stage, existing controls must be maintained.

#### 9 Legionella action plan

- 9.1 The risk assessor will list any associated hazards that are likely to cause the introduction and growth of legionella, within the premises water systems by means of an action plan.
- 9.2 This action plan forms part of the overall risk assessment and identifies, during the inspection, those measures needed to eliminate or control the hazards identified. Each hazard identified is given a risk rating of high, medium or low to assist in the setting of priorities. It will include an indication of who is responsible for the management of the action, and the expected time within which the required works need to be completed. Copies of the risk assessment including the action plan will be held on/ accessible by sites and filed electronically against the appropriate property in The Bradley Teams Database.
- 9.3 The action points will fall into two categories:
  - Management carried out by staff designated by the Responsible Person. These are mainly tasks such as recording temperatures (within the water log book) or arranging non water associated tasks (signage, collating paperwork). These actions must be recorded and signed off as complete by the Responsible Person.
  - **Specialist Work** carried out by appointed contractors. This should be arranged in consultation with the Water Hygiene Consultants and the Responsible Person, who will ensure that the action plan held on/accessible by the site, is evidenced to confirm that the specialist works have been completed.

#### 10 Legionella written control scheme

- 10.2 Once the risk is identified and assessed, a written control scheme must be prepared, implemented and properly managed for preventing or controlling legionella.
- 10.3 The scheme will specify the various control measures required, how to use and carry out those measures, describe the water treatment regimens and the correct operation of the water system. The scheme will be specific and tailored to the system covered by the risk assessment.

- 10.4 The information that will be included within the legionella written control scheme is:
  - purpose;
  - scope;
  - risk assessment;
  - management structure:
  - Duty Holder(s);
  - Responsible Person(s) and communication pathways;
  - training;
  - allocation of responsibilities, i.e. to the Duty Holder(s), Responsible Person(s)m responsible persons and water Hygiene contractors service provider;
  - up-to-date schematic plan showing the layout of the system(s) and its location within and around the premises - this should identify piping routes, storage and header tanks, calorifiers and relevant items of plant, especially water softeners, filters, strainers, pumps, stand by equipment, and all water outlets;
  - source of water supply, for example whether from a mains supply or not;
  - The correct and safe operation of the system;
  - Precautions in place to prevent or minimise risk associated with the system;
  - Analytical tests, including microbiological testing, other operational checks, inspections and calibrations to be carried out, their frequency and any resulting corrective actions;
  - remedial action to be taken in the event that the scheme is shown not to be effective, including control scheme reviews and any modifications made;
  - health and safety information, including details on storage, handling, use and disposal of any chemical used in both the treatment of the system and testing of the system water;
  - Incident plan, which covers the following situations
    - o major plant failure, for example chemical system failure;
    - o very high levels or repeat positive water analyses for legionella;
    - an outbreak of Legionellosis, suspected or confirmed as being centred at the site; and
    - an outbreak of Legionellosis, the exact source of which has yet to be confirmed, but which is believed to be centred in an area which includes the site.
- 10.5 This procedure and each site's specific water log book, sets out the control measures and the management systems utilised by Elderpark (known also as the legionella written control scheme), to manage and control the risk of Legionellosis and Legionnaires Disease and complies with the 'ACOP L8'.

#### 11 Record Keeping

- 11.1 The Responsible Person must ensure that the significant findings of the risk assessment are recorded; this should include details of any persons identified as being particularly at risk and the steps taken to prevent or control the risks. Appropriate records must be kept, both centrally by the Responsible person and on site for tasks completed locally by competent and identified persons.
- 11.2 Records should include details of the following;
  - The person or people responsible for conducting the risk assessment, managing, and implementing the written scheme;
  - Any significant findings of the risk assessment;
  - The written control scheme and its implementation; and
  - The results of any inspection, test or check carried out, and the dates.
- 11.3 The Association will utilise Bradley Environmental TEAMS database for legionella management as well as uploading the same data to a Legionella Management Control database located centrally within the maintenance Departments electronic filing system.
- 11.4 Both shall have links to each sites legionella Control scheme and will track any completed risk assessments and follow up risk assessments, remedial works issued along with completions, certificates and schedule of visits. It shall also provide information on any changes to the condition of the tanks and outlets within the system.
- 11.3 Regulations require that records are to be retained throughout the period for which they remain current and for at least two years after that period. Records kept in accordance with inspection, test or checks carried out should be retained for at least five years.

#### 12 Legionella Risk Assessment review process

- 12.1 Legionella risk is to be managed via a programme of works scheduled by the Responsible Person, where every year each property identified on the contractual program of works, will require a six-monthly interim inspection and an annual interim audit including a desktop review.
- 12.2 The following tasks are undertaken during each of the following inspections. Six month interim inspections:
  - check tank water temperature remote from ball valve and mains temperature at ball valve;
  - Note maximum temperature recorded by fixed max/min thermometers where fitted;
  - auditing of the water log book; and
  - Engineer's site visit report.

#### 12.3 Annual interim audit:

- From onsite meeting, understanding of existing Risk Assessment;
- Check for additional water systems work to property;

- auditing of existing water log book;
- check tank water temperature remote from ball valve and mains temperature at ball valve;
- Note maximum temperature recorded by fixed max/min thermometers where fitted;
- Engineers site visit report;
- visual inspection of cold water storage tanks for compliance to Approved Code of Practice L8, risk assess as required;
- Calorifiers drain off water inspected for colour, scale and debris; risk assess as required;
- Random outlet temperature checks;
- composition of necessary remedial works report;
- Production of follow-up risk assessment report if required;
- Schedule of works by mandatory and recommended works if required;
- Engineer's site visit report; and
- Authorised certificate of follow-up risk assessment.
- 12.4 The assessment of risk is an ongoing process and not merely a paper exercise. Responsible Persons should arrange to review the assessment regularly and specifically when there is reason to suspect it is no longer valid. An indication of when to review the assessment and what to consider should be recorded and this may result from:
  - A change to the water system or its use;
  - A change to the use of the building where the system is installed;
  - New information available about risks or control measures
  - The results of checks indicating that control measures are no longer effective;
  - Disease/Legionellosis associated with the system; and/or
  - if the assessment is thought to be no longer valid
- 12.5 Where there is a change to key personnel particularly related to the management of legionella, the newly appointed individual must be immediately informed of their duties and be aware of the risk assessments applicable to the properties being managed.

#### 13 Remedial actions

13.1 Remedial actions may arise from a new or revised water hygiene assessment, local monitoring (e.g. temperature monitoring), or routine servicing by the appointed contractor. In all cases actions will be allocated a priority code, as shown below. Actions will be managed and monitored by the responsible person.

Rating	Description	Compliance period
Low	Slight risk under exceptional operating conditions	12 months
Medium	Slight risk under normal operating conditions	6 months
High	Serious risk present	1 month

- 13.2 In all cases where a risk is categorised as High, immediate measures will be put into place to reduce that risk, these measures may be short term compensatory measures such as taking a communal shower room out of use, which are intended to reduce risk to a low or medium level whilst a longer term solution is investigated. These measures will be put into place after advice has been obtained from the appointed water hygiene consultant via the responsible person and a record made in the water hygiene risk assessment.
- 13.3 In all cases where a risk is categorised as Medium or Low remedial actions will be raised within 10 days of the receipt of the recommendation and will be completed in line with consultation with the Water Hygiene consultants and as stated in the individual quotation timescales.

#### 14 Controlling the risk

- 14.1 Legionnaires' disease is a potentially fatal form of pneumonia, and everyone is susceptible to infection. There are a number of factors that increase susceptibility including increasing age (particularly those over 50 years); those with existing respiratory diseases or certain illnesses and conditions such as cancer, diabetes, kidney disease; alcoholics; smokers; and those with an impaired immune system.
- 14.2 Duty Holders are required to prevent or control the risk from exposure to Legionella. For control measures to be effective, it is essential to keep the whole system clean, as biofilms or inorganic matter such as scale can reduce the efficacy of any type of control measure significantly.
- 14.3 Flushing of outlets The risk from legionella is increased in peripheral parts of the hot and cold water system where there are remote outlets such as hand washbasins, and deadlegs, and outlets which have minimal use. Where reasonably practicable, deadlegs should be removed or the risk minimised by regular use of these outlets.
- 14.4 Flushing involves the regular movement of hot and cold water in distribution pipework and outlets, particularly those that are little used, and must be conducted weekly for several minutes to ensure water cannot stagnate in the hot and cold water systems.
- 14.5 If there has been a lapse in the flushing regime, the stagnant and potentially contaminated water from within the shower or tap and associated dead leg should be purged to drain without discharge of aerosols before the appliance is used.
- 14.6 Temperature control is the traditional strategy for reducing the risk of legionella in water systems. Cold water systems should be maintained, where possible, at a temperature below 20°C.
  Hot water should be stored at least at 60°C and distributed so that it reaches a temperature of 50°C.
- 14.7 Where temperatures present outside the ranges quoted above, the Responsible Person must make the necessary evidential recording, and process a request for investigation/remedial action through the repairs process.

- 15 Scalding and Thermostatic Mixing Valves (TMVs)
- 15.1 Much higher temperatures should be avoided because of the risk of scalding. Potential scalding risk should be assessed and controlled in the context of the vulnerabilities of users. At 50°C, the risk of scalding is low for most people, but the risk increases with higher temperatures and for longer exposure times. However, the risk particularly to the elderly, disabled, young children, and those with sensory loss who may not be able to recognise high temperatures and respond quickly, will be greater.
- 15.2 TMVs are valves that use a temperature sensitive element and blend hot and cold water to produce water at a temperature that safeguards against the risk of scalding, typically between 38°C and 46°C depending on outlet use.
- 15.3 The most serious risk of scalding is where there is whole body immersion, such as with baths and showers and TMVs should be fitted at these outlets.
- 15.4 For most people, the scalding risk is minimal where water is delivered up to 50°C, where a TMV is not fitted, however where a risk assessment identifies a significant scalding risk is present, fitting the appropriate TMVs at outlets, such as hand washbasins and sinks, is also required.
- 15.5 Where the risk assessment considers fitting TMVs appropriate, to maintain protection against scald risk, they require regular routine maintenance carried out by competent individuals in accordance with the manufacturer's instructions, as the blended water downstream of TMVs may provide an environment in which legionella can multiply, thus increasing the risks of exposure.

  Strainers or filters should be inspected, cleaned, descaled and disinfected annually or on a frequency defined by the risk assessment, taking account of any manufacturers' recommendations.

#### 16 Operational requirements

- 16.1 Checks, testing and inspections For precautions to remain effective, the condition and performance of the system will need to be monitored. The Responsible Person will oversee and manage this. Management should involve:
  - checking the performance and operation of the system;
  - inspecting the accessible parts of the system for damage and signs of contamination; and
  - monitoring to ensure that the treatment regime continues to control to the required standard.
- 16.2 Routine checks, inspections and testing will be completed by a combination of Water Hygiene consultants and identified Elderpark Staff designated with specific responsibilities and tasks relating to the management of water hygiene on sites.
- 16.3 The frequency of checks and inspecting of hot and cold water systems will depend on their complexity and the susceptibility of those likely to use the water. The risk assessment will define the frequency of inspection and monitoring depending on the

type of use and user and particularly where there are adjustments made by the assessor.

16.4 Appendix 4 contains a check list for hot and cold water systems with an indication of the frequencies of required checks and inspections.

#### 17 Voids

- 17.1 The term 'void' relates to a property that remains unoccupied for a period i.e. following termination of a tenancy by the previous tenant and prior to a new tenancy commencing.
- 17.2 Where a building, part of a building or water system is taken out of use, it should be managed so that microbial growth, including legionella, in the water is appropriately controlled.
- 17.3 Guidance on the process for management of water hygiene in voids is contained within Appendix 5.

#### 18 Commissioning

- 18.1 The commissioning of a water system means the bringing of a new system into operation and applies to all component parts of a building water system including attached equipment. The aim of commissioning is to check the system is performing to design specifications, that there are no leaks and that the flow of the hot water system is balanced.
- 18.2 From a microbiological perspective, the period between filling the system and bringing it into normal use is potentially the most hazardous. A risk assessment should be performed before commissioning, to identify and take into account the potential for stagnation as this may lead to microbial growth where buildings are not to be fully occupied immediately or where systems are commissioned as occupation occurs, e.g. infrequently or intermittently used buildings.
- 18.3 Before commissioning, the nature of the incoming water supply must be determined. If it is a public water supply, the water supplier will be able to provide details of the testing carried out in the local water supply zone in which the building is situated. If the building has a private water supply, the local authority should be contacted to carry out a private water supply risk assessment, if this has not been done already.
- 18.4 The building owner is responsible for complying with the regulatory requirements as notified by the water supplier or the local authority, as appropriate, irrespective of whether it is a public or private water supply, or a combination of both.
- 18.5 Any new water system will require, as a minimum, flushing and disinfection before being brought into use, and larger more complex systems may also require disinfection. The building commissioning process should take into account the size and complexity of the water system. A new, correctly designed and installed water system should provide wholesome water at every outlet and where there are any problems, the design or installation defect should be identified and rectified.

#### 19 Log Book

- 19.1 Actions undertaken to remove hazards identified in the risk assessment and all ongoing management actions taken to control the risk of legionella arising must be recorded.
- 19.2 For this purpose, a water log book specific to the site as detailed in Appendix 6 must be held at the site and completed by the Responsible Person and Water Hygiene consultants, appointed contractors and other staff designated with specific responsibilities and tasks relating to water hygiene management. Appendices 6-15 provide some samples of log book requirements

#### 20 Legionella Monitoring

- 20.1 There is a need to implement a monitoring system to ensure that action plans are being signed off and Legionella management logs are being completed.
- 20.2 The Water Hygiene consultant will also inspect both the risk assessment action plan and site water log book six monthly.
- 20.3 Microbiological monitoring, sampling, for legionella is conducted in hot and cold water systems annually by the Water Hygiene consultant in all properties where a full legionella risk assessment has been completed. The risk assessment should specifically consider systems supplied from sources other than the mains, such as private water supplies, where sampling and analysis may be appropriate.
- 20.4 Microbiological monitoring will be carried out in accordance with BS 7592 Sampling for Legionella organisms in water and related materials where there is doubt about the efficacy of the control regime or it is known that recommended temperatures, disinfectant concentrations or other precautions are not being consistently achieved throughout the system.
- 20.5 The circumstances when monitoring for legionella would be appropriate include:
  - Water systems where the control levels of the treatment regime, for example temperature or disinfectant concentrations, are not being consistently achieved. In addition to a thorough review of the system and treatment regimes, frequent testing, for example weekly, should be carried out to provide early warning of loss of control. Once the system is brought back under control as demonstrated by monitoring, the frequency of testing should be reviewed;
  - where risk assessment considers it appropriate to monitor in high-risk areas or where there is a population with increased susceptibility, for example in healthcare premises including care homes;
  - water systems suspected or identified in a case or outbreak of Legionellosis where it is probable that it will be required for samples to be taken for analysis; and

- Water systems treated with biocides where water is stored, or distribution temperatures are reduced. Initial testing should be carried out monthly to provide early warning of loss of control. The frequency of testing should be reviewed and continued until such a time as there is confidence in the effectiveness of the regime.
- 20.6 Guidance notes on the action post confirmation of a positive sampling can be found at Appendix 7.
- 20.7 Cleaning and disinfection the risk from exposure to legionella must be controlled by keeping the water system and water within it clean and free from nutrients, including those arising from contamination and corrosion, and maintaining its cleanliness.
- 20.8 Where necessary hot and cold water systems should be cleaned, flushed and disinfected in the following situations, as specified by BS 8558:
  - on completion of a new water installation or refurbishment of a hot and cold water system;
  - On installation of new components, especially those which have been pressure tested using water by the manufacturer;
  - Where hot and cold water is not used for a prolonged period and has not been flushed as recommended or the control measures have not been effective for a prolonged period;
  - On routine inspection of the water storage tanks, where there is evidence of significant contamination or stagnation;
  - If the system has been substantially altered or entered for maintenance purposes that may introduce contamination;
  - following water sampling results that indicate evidence of microbial contamination of the water system;
  - During or following an outbreak or suspected outbreak of Legionellosis linked to the system; or
  - Where indicated by the risk assessment.
- 20.9 Disinfection of the water services when the system is offline may be by
  - Thermal Disinfection for example, by raising the hot water system temperature to a level at which legionella will not survive, drawing it through to every outlet, and then flushing at a slow flow rate to maintain the high temperature for a suitable period of time (the contact time).
  - Chemical Disinfection for example, by adding an effective agent such as chlorine or chlorine dioxide, drawing it through to every outlet, then closing the outlets and allowing it to remain in contact for a suitable period (contact time). This method is commonly used when it is necessary to disinfect the cold water storage tanks and the whole system.
- 20.10 Evidence of the competence of individuals undertaking these forms of disinfection should be confirmed by the Water Hygiene consultants and the responsible person, indicating that the knowledge and experience of the operatives is satisfactory for undertaking the proposed works.
- 20.11 A suitable safe system of work, or for more complex systems, a site specific method statement should be obtained before the start of any cleaning and/or

disinfection of a water system. The documentation should clearly define the process to be undertaken and should be derived from risk assessments of the typically encountered hazards, which may include:

- access/egress, storage and special site hazards such as asbestos;
- Machinery and equipment isolation;
- working in confined spaces;
- Manual handling;
- Work at height;
- slip, trips and falls;
- Electrical equipment;
- Chemicals to be used;
- Personal protective equipment required; and/or
- Waste disposal and chemical neutralising process (a discharge permit may be required form the water utility).

#### 21 Training and competence

- 21.1 Elderpark must ensure that those appointed to carry out the risk assessment, draw up the written control scheme and assist in the management of water hygiene have the ability, experience, instruction, information, training and resources to enable them to carry out their tasks competently and safely. This will be ensured by the association's procurement and contractor approval process.
- 21.2 Responsible Persons The Chartered Society for Worker Health Protection (BOHS), P901 Control of Legionella in Domestic Hot and Cold Water Systems, provides an overview of legionella bacteria risk, and how it can be controlled in hot and cold water systems in compliance with regulatory requirements. This is a one-day course with a written theory examination, successful completion of which achieves a qualification equivalent to NVQ Level 4 and HNC level.
- 21.3 The responsible person appointed by Elderpark Housing to take day to day responsibility for controlling any identified risk from legionella bacteria must have sufficient authority, competence and knowledge of the installation to ensure that all operational procedures are carried out effectively and in a timely manner.
- 21.4 Staff members The Chartered Society for Worker Health Protection (BOHS), P900 Control of Legionella in Domestic Hot and Cold Water Systems provides a foundation level of knowledge on identifying and controlling legionella risk to identify the risks posed by legionella bacteria and understand how to manage the risks in domestic water systems, to a standard which minimises the risk of exposure and ill health. This is a level 3 qualification in the BOHS qualifications framework.

# 22 Confidentiality, General Data protection Regulations (GDPR) and Freedom of Information (FOI)

The Association is fully committed to compliance with the requirements of the General Data Protection Regulations (EU) 2016/679 (GDPR), which came into force on 25 May 2018. The Association will therefore follow procedures that aims

to ensure that all employees, Committee members, contractors, agents, consultants, partners or other persons involved in the work of the Association and who have access to any personal data held by or on behalf of the Association, are fully aware of and abide by their duties and responsibilities under GDPR.

22.2 Housing is classed as a Scottish Public Authority under the Freedom of Information (Scotland) Act 2002 (FOISA). This act places a duty on Scottish Public Authorities to allow the public access to information they hold. This Policy has been written to ensure openness and transparency in line with this legislation and will be published on our website and available in other formats upon request. Information in relation to records held can also be made available upon request where the request meets the criteria set out in the legislation. Any such request should be made in line with our Freedom of Information and Environmental Policy.

#### 23 Complaints

23.1 Complaints regarding this policy or its implementation will be handled under our Complaints Handling Policy and Procedure which can be found on our website or from our offices.

#### 24 Monitor and Review

- 24.1 All Shared cold water tanks within our non-domestic, communal and domestic properties shall be held in the associations Tank risk register.
- 24.2 A Key Performance Indicator (KPI) report shall be presented to the Elderpark Housing management Committee providing the following;
  - Performance relating to ensuring that all water storage have been identified and receive a legionella risk assessment and condition survey.
  - Performance relating to carrying out continuous tests to record the temperature and the condition of the tends to determine if the temperature is not in the range of 20 – 45oC favour the growth of Legionella in water systems as this promotes the growth of legionella.
  - Reports of any Legionella related incidents that has occurred.

## Appendix 1 Equality Impact Assessment

Legionella	Asbestos	New policy or	Revision				
	Management Policy	revision of existing?					
Person(s) responsible for ass	•	David Adam					
1. Briefly describe the	The purpose of this policy is to set out how Elderpark Housing will						
aims, objectives and	manage its water storage tanks located within its stock to mitigate						
purpose of the policy.		-					
parpose or and posse,		the risk of a Legionella outbreak. This policy aims to mitigate so far as is reasonably practicable the risks associated with Legionella as a					
		nanagement and testing	•				
	•	lla growth and outbreak	•				
		holder and the Responsi					
2. Who is intended to		he general public who n					
benefit from the policy?		ng on or using outlets fro	•				
(e.g. applicants, tenants,	storage.		,				
staff, contractors)	· ·						
3. What outcomes are	To ensure that Legion	ella is managed and that	through regular				
wanted from this policy?		ments continues to be n					
(e.g. the measurable		staff, tenants contracto	_				
changes or benefits to	public.		-				
members/ tenants / staff)							
4. Which groups could be af	fected by the policy? (n	ote all that apply)					
Age		Disability					
Gender reassignment		Marriage and Civil					
		Partnership					
Pregnancy and Maternity		Race					
Religion or Belief		Sex					
Sexual Orientation							
5. If the policy is not relevan	t to any of the equality	groups listed above, st	ate why and end the				
process here.							
This policy is a general health	n and safety policy and i	none of the equality gro	ups listed above are				
affected by this policy							
6. Have those affected by th	e policy / decision bee	n involved?					
7. Describe the likely positiv		Positive Impact(s)	Negative Impact(s)				
impact(s) that the policy cou	ıld have on the						
groups identified above.							
8. What actions are required	I to address the						
impacts arising from this ass	essment? (This might						
include: additional data, put	ting monitoring in						
place, making adjustments, taking specific action							
to mitigate any potentially negative impacts)							
Signed:	$oxed{arGamma}$	David Adam					
Dated:	1	3/9/2021					
15/5/2021							

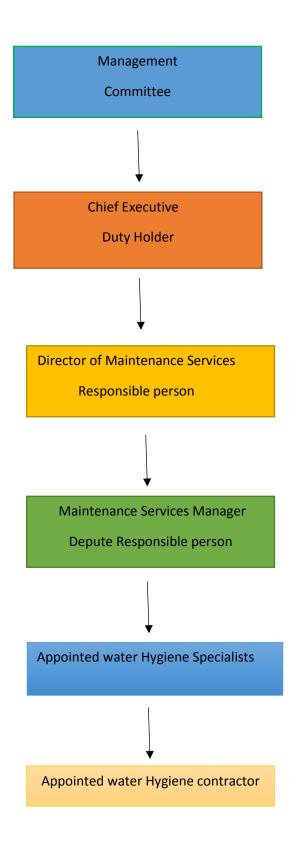
#### **Appendix 2 GDPR Impact Assessment**

Name of Policy	Legionella	New policy or	Review					
to be assessed	Management Policy	revision of existing?						
Person(s) responsible for ass	sessment	David Adam						
Briefly describe the aims,	The purpose of this po	licy is to set out how Eld	derpark Housing will					
objectives and purpose of	• •	age tanks located within						
the policy.	_	outbreak. This policy ai	_					
the policy:	l — — — — — — — — — — — — — — — — — — —	cable the risks associate	-					
	7 '	anagement and testing	~					
	•	lla growth and outbreak	· · · · · · · · · · · · · · · · · · ·					
		holder and the Responsi	• •					
Which type of data will be		he addresses of propert	•					
used by implementation	,	testing and risk assessr						
of this policy? (e.g.	are being carried out.	i testilig alla lisk assessi	ilelits survey works					
personal, sensitive or	_	ldresses of properties re	ocaiving curvove prior					
		I works being carried ou						
special category) What outcomes are		n line with our privacy po						
wanted from this policy?	legisiation to ensure of	ompliance with GDPR /	FUISA.					
(e.g. necessary to meet								
legal obligations)								
Which groups could be affect	tea by the policy? (not							
Tenants		Committee						
Employees		Contractors						
If the policy is not relevant t	o any of the data group	s listed above, state wh	ny and end the					
process here.								
Have those affected by the	oolicy / decision heen in	nvolved?						
Contracts are in place between	-		ng this policy. This					
does not relate to any person	•	mvolved in implementi	is this policy. This					
does not relate to any person	iai autu.							
Describe the likely positive of	or negative impact(s)	Positive Impact(s)	Negative Impact(s)					
that the policy could have or	• • • • • • • • • • • • • • • • • • • •	- column impact(c)	inegative impact(e)					
identified above.	8. oa po							
What actions are required to	· · · · · · · · · · · · · · · · · · ·							
arising from this assessment? (This might include:								
1.11.1		additional data, putting monitoring in place,						
	· ·							
making adjustments, taking	specific action to							
· · · · · · · · · · · · · · · · · · ·	specific action to							

Signed:	David Adam		
Dated:	13/9/2021		



## Appendix 3 – Legionella Management Organisational Structure





## Appendix 4 – Checklist for hot and cold water systems

Service	Action to take	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.	Monthly
	For circulating systems: take temperatures at return legs of principal loops (sentinel points) to confirm they are at a minimum of 50 °C. 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. 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	Quarterly (ideally on a rolling monthly rota)
	All HWS systems: take temperatures at a representative selection of other points (intermediate outlets of single pipe systems and tertiary loops in circulating systems) to confirm they are at a minimum of 50 °C, to create a temperature profile of the whole system over a defined time period	Representative selection of other sentinel outlets considered on a rotational basis to 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 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	Inspect cold water storage tanks and carry out remedial work where necessary	Annually
	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
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. To identify any local heat gain, which might not be apparent after one minute, observe the thermometer reading during flushing	Monthly
	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 weatherproofing 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, eg areas of high risk
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 (eg to the recirculating pipework or the pipework supplying a more frequently used upstream fitting) but preferably by removing the feeding 'T' Infrequently used equipment within a water system (ie not used for a 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 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, eg healthcare and care homes, more frequent flushing may be required as indicated by the risk assessment	Weekly, or as indicated by the risk assessment
TMVs	Risk assess whether the TMV fitting is required, and if not, remove Where needed, inspect, clean, descale and disinfect any strainers or filters associated with TMVs 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	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



#### Appendix 5 Management of water hygiene in voids

It is recognised that all void properties have the potential to exhibit increased risk of Legionella due to the possibility of stagnant water remaining undisturbed within pipework for prolonged periods.

To mitigate the increased potential risk associated with voids, the void contractor appointed to carry out repairs and re-decoration works on all void properties will receive a works order to carry out and record the following:

- Thoroughly flush all taps;
- Clean and disinfect, or replace, all shower heads;
- Inspect and report on water storage tank (where present).

SOR	Description
690001	Void: Drain down hot and cold domestic water system to void property.
690003	Void: Refill hot and cold domestic water system to void property and check incoming water supply.
690005	Void: Carry out safety check of complete hot and cold water plumbing and waste installation to any void property and provide written report to the Client Representative.
631117	Shower head: Renew any rose spray shower head including disconnect and remove old and fix new head and reconnect existing pipework and remove waste and debris.
631121	Shower: Overhaul and clean out shower head including remove and refix as necessary.
665029	Tank: Access roof space and overhaul any cold water storage tank, take off, set aside and later refix insulation and lid, overhaul all valves, repair any leaks, renew float operated diaphragm valve, clean out tank, clear all airlocks, drain and refill tank as necessary.



Appendix 6 Log Book

## **Cold Water Storage Tanks Temperature and Inspection**

Tank Ref	Date	Stored Temp	Incoming Temp	Dirty Y/N	Corrosion Y/N	Stagnant Y/N	Biofim Y/N	Comments
CWST 1								
CWST 2								

Last Review: November 2021 Next Review: November 2024 Policy Number: M10



#### Appendix 7 Emergency Plan

Action to be taken in the event of an outbreak/suspected outbreak of Legionnaires Disease

#### Introduction

An outbreak of Legionnaires Disease will be confirmed by the Public Health Laboratory Service (PHLS) via the Designated Medical Officer for Greater Glasgow Public health.

The HSE and Glasgow City Council's Environmental and Regulatory Services will be notified of the outbreak. Then they will establish an Outbreak Committee to take any appropriate actions to prevent further infection of the public. This will be initially focussed on the determination of the source of the Legionella bacterium.

If the HSE suspects an Elderpark premises is a possible source of the infection they have the legal authority to take action to halt any further spread of infection.

#### Action to be taken

- 1. The relevant "Responsible Person" and the Premises Manager will be required to ensure the water system is closed down to prevent further infections e.g. parts of process capable of disseminating airborne water droplets.
- 2. They will also co-operate with the HSE in their investigation by providing any details requested by them which may include details of all specialist contractors, records of all

Maintenance and monitoring programmes etc. The HSE will focus on the following actions in their investigation:

- Taking water samples from the suspect water systems
- Requesting health records of employees

- Investigation of any premises, infrastructure, procedures, contracts and records
- Taking statements from employees, contractors or consultants
- 3. The "Responsible Person", will ensure the following actions are taken as appropriate:
  - Switch off pumps and decommission plant as soon as practicable
  - Keep all personnel away from source of infection
  - When cleared by the HSE, instruct specialist contractors to undertake complete sterilisation of the infected system(s), if required
  - Consult with enforcing authority before allowing water system to be re-used
  - Ensure samples of water are taken for laboratory investigation, if required
  - Test system to ensure free from infection prior to return to normal use



## Appendix 8 Contractor Service Provider Visits

## Site Name/Address 65 Golspie Street – Main Office

Date	Name	Company	Reason for visit	Documentation and Handover given	Signature



## Sample Recording Sheets

## Appendix 9 – Monthly Temperature Checks of hot water cylinders

Date		Outgo	ing wateı (sl	r tempera hould be	Comments/Concerns/Escalation					
				Tank Re						
	1	2	3	4	5	6	7	8	9	



## Appendix 10 Sample log book – Return Water temp to hot water tanks

Date	F	Return W		perature hould be	Comments/Concerns/Escalation					
			•	Tank Re						
	1	2	3	4	5	6	7	8	9	



#### Appendix 11 Sample Log book – Monthly checks at sentinel hot and cold water outlets

Date	Tem	peratures	Comments						
		(Hot sh							
	Ta	Tank 1		Tank 2		nk 3	Tar	nk 4	
	Nearest	Furthest	Nearest	Furthest	Nearest	Furthest	Nearest	Furthest	

Note; If a thermostatic mixing vale (TMV) is present, use a surface temperature probe for measuring the temperature at the inlet pipe to the TRV



## Appendix 12 – temperatures at Cold Water sentinel outlets

Date		Temperatures at cold water sentinel outlets for each cold water tank (refer to schematic)  (Should be less than 20 degrees within 2 minutes of running the outlet)							Comments
		nk 1		nk 2				nk 4	
	Nearest	Furthest	Nearest	Furthest	Nearest	Furthest	Nearest	Furthest	



## Appendix 13 - Quarterly temperature Checks at tertiary sentinel outlets

Date		Quarterly	temperati	ures subor	dinate/te	rtiary sen	tinel outle	ets	Comments
	Та	nk 1	Tank 2		Tar	nk 3	Tar	nk 4	
	Nearest	Furthest	Nearest	Furthest	Nearest	Furthest	Nearest	Furthest	



## Appendix 14

## Flushing of infrequently used outlets

(The outlets should be flushed weekly for 2 minutes)

Date		(	Outlet Nu	ımber <mark>(re</mark>	Comments					
	1	2	3	4	5	6	7	8	9	



## Appendix 15

## Annual temperature testing of a representative number of hot and cold water outlets

(on a rotational basis to give a temperature profile)

Water	Date	Temp at cold	Temp at hot	Comments
outlet		water outlet	water outlet	
number (on				
plan)				
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				