



Control of Legionella Policy

Presented to Board for Approval: 27th November 2025

Next Review: November 2027

1.0 Introduction

- 1.1. The purpose of this policy and procedure is to outline the processes and legislative areas that should be followed in relation to the control of legionella bacteria in the water systems within properties owned by the Association.

2.0 Definitions

- 1.2. Legionella bacteria is naturally occurring within environmental water sources such as rivers, lakes and reservoirs, but is usually in low numbers due to the water temperature not being favourable for growth. As they are found in the environment it is possible that the bacteria may enter man-made distribution systems such as water distribution pipe work or storage tanks.
- 1.3. Legionnaires disease is a potentially fatal form of pneumonia caused by the inhalation of Legionella bacteria. The bacteria are usually normally found within fine water droplets that may be caused by operating a cooling tower, shower, spray apparatus, running a tap outlet or operating a humidifier.
- 1.4. Legionnaires disease has the potential to affect anyone. However, those more susceptible are normally in the age range of 45 and above, are smokers, or suffer from chronic respiratory or kidney disease or have impaired immune systems.
- 1.5. Legionella survives low temperatures and thrives at temperatures between 20-45 degrees celsius if conditions are right (e.g., if a supply of nutrients is present, such as rust, sludge, scale, and other bacteria).

3.0 Policy Aims

- 3.1 The Association will aim to minimise and control the risk of Legionnaires' disease, and will:
 - Appoint a responsible person who will have a duty to put in place an action plan to minimise the risk of Legionella and to manage and monitor the necessary work systems and processes.
 - Identify and assess sources of risk (e.g., where conditions present that may encourage Legionella bacteria to multiply or where there is a means of creating and disseminating breathable droplets) and establish any areas of non-compliance.
 - Assess the level of risk through a structured Legionella Risk Assessment programme and aim to eliminate or reduce the risk to an acceptable level.

- Arrange for routine inspection and maintenance of water systems, and where needed, a programme of disinfection or risk removal.
- Retain records of maintenance, inspection, and testing for a minimum of 5 years.

4.0 Roles and responsibilities

- 4.1 The CEO is the statutory duty holder and is responsible for ensuring that the legionella risk is controlled within the Association's properties.
- 4.2 The CEO shall ensure that adequate resources are available for the implementation, monitoring and recording of appropriate processes which comply with the Legionella Approved Code of Practice.
- 4.3 The CEO shall also ensure that adequate resources are available to provide appropriate information, instruction, training, and supervision to employees identified as having a role in the implementation of legionella management processes and procedures.
- 4.4 The Head of Asset Management shall be the 'Responsible Person' who will be responsible for the following:

Management Responsibility for all aspects of Legionella Control.

Ensure suitable arrangements are in place to identify all water systems owned by the Association and assess them for the potential risk of legionella infection.

Establish suitable arrangements to manage identified risk areas, including identification of management responsibilities, training, and competence.

Ensure that adequate resources are available to address any needs identified in the risk assessments.

Review the risk assessments and remedial measures implemented every two years.

Ensure that the established procedures are brought to the attention of all persons affected by them.

5.0 Legislation

- 5.1 The Policy acknowledges the Association's responsibilities to comply with the following legislation and associated guidance on the control of Legionella bacteria in water systems:
- Health & Safety at Work Act 1974.
 - The Management of Health & safety at Work Regulations 1999.
 - Control of Substances Hazardous to Health (COSHH) Regulations 2002.

- L8 – The Control of Legionella Bacteria in Water Systems – Approved Code of Practice and Guidance (ACOP) 4th Edition.
- HSG274 Legionnaires Disease – Technical Guidance (in 3 Parts) 2013.
- IACL27 (rev) Legionnaires Disease – A brief guide for Duty Holders (2012).
- BS8580:2010 Water Quality – Risk Assessments for Legionella Control.
- Reporting of Injuries, Diseases and Dangerous Occurrence Regulations 2013.

6.0 Risk Assessments

- 6.1 The HSE Guidance note ‘Legionella and landlords responsibilities’ recommends that a proportionate approach should be taken to assess risk and that an in-depth detailed risk assessment is not necessarily required. The guidance note further asserts that generally the risk from hot and cold-water systems in most residential buildings is low due to the regular water usage and replenishment.
- 6.2 The Association will arrange for a suitable and sufficient risk assessment programme to be carried out to identify and assess the risk of exposure to legionella bacteria from all water systems across its portfolio.
- 6.3 The Association will appoint a competent and qualified external assessor to carry out the risk assessment programme, and risk assessments will be reviewed on a two year basis, or sooner if they are believed to be no longer valid due to:
- Changes to the water system.
 - The availability of new information about risks or control measures.
 - The results of checks indicating that control measures are no longer effective.
 - An outbreak of legionnaires disease is associated with the system.

7.0 Control Measures

- 7.1 Control measures will include:
- Avoidance of debris entering the water system – systems with stored cold water to be checked to ensure that tanks have tight fitting lids.
 - Control parameters for the system to be checked, e.g., temperature settings for hot water cylinders.
 - Redundant pipework and ‘dead legs’ identified and removed.
 - Advice provided to new tenants on maintaining safe water systems.
 - Advice provided to existing tenants via website, newsletters etc.

Appendix A provides information on further control measures, and inspection and testing frequencies.

8.0 Record keeping

8.1 Each risk assessment shall include the following information:

- Any specific actions required which has been identified during the assessment.
- The frequency of the control measure.
- Persons responsible for undertaking any actions.

8.2 All records will be kept for a minimum of 5 years.

9.0 Review of Policy

9.1 This policy will be reviewed after the first year, and every two years thereafter.

Appendix A – Control Measures and Inspection Frequencies

| Void Properties | | |
|------------------------|---|-------------------------------|
| Service | Task | Frequency |
| Hot water | Flush through hot water to all outlets. | Weekly |
| | The water temperature from 'Sentinel taps' should be at least 50° C within one minute of running the water | Domestic Clean Handover |
| | The outgoing water temperature from the calorifier should be at least 60° C and the return to the calorifier at least 50° C | Void Gas Safety Check |
| | Clean and disinfect tap outlets | Domestic Clean Handover |
| Cold Water | Flush through cold water to all outlets. | Weekly |
| | The water temperature from 'Sentinel taps' should be at below 20° C within two minutes of running the water | Domestic Clean Handover |

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|----------------------------|--|--|
| | Clean and disinfect tap outlets | Domestic Clean Handover |
| Shower heads | Dismantle, disinfect, clean, and descale shower heads and hoses. | Domestic Clean Handover |
| Thermostatic Mixing valves | Inspect, clean, and maintain. Undertake fail safe checks | According to manufacturer's instructions |

| Office Premises | | |
|------------------------|---|------------------|
| Service | Task | Frequency |
| Little used outlets | Flush through and purge to drain or purge to drain immediately before use, without release of aerosols | Weekly |
| Hot Water | The water temperature from 'Sentinel taps' should be at least 50°C within one minute of running the water | Monthly |
| | The outgoing water temperature from the calorifier should be at least 60°C and the return to the calorifier at least 50°C | Monthly |
| | The input water temperature to TMVs should be at least 50°C within one minute of running the water | Monthly |
| | Drain the calorifier checking for debris, inspect and clean as necessary | Annually |
| | The water temperature from a representative number of taps on a rotational basis should be at least 50°C within a minute of running the water | Annually |
| Cold Water | The water temperature from 'Sentinel taps' should be at below 20°C within two minutes of running the water | Monthly |
| | The water temperature from a representative number of taps on a rotational basis should be below 20°C within two minutes of running the water | Annually |
| Shower heads | Dismantle, disinfect, clean, and descale shower heads and hoses. | Quarterly |