



PLYMOUTH COMMUNITY HOMES LEGIONELLA CONTROL POLICY

Version:	2
Lead Directorate:	Homes and Communities
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1. Purpose

1.1 The purpose of this policy is to outline Plymouth Community Homes' (PCH) approach to managing Water Safety at properties under the organisation's management and control. PCH recognises that it has a duty of care towards employees, residents, contractors, visitors, and others who may be at risk from water systems in properties that PCH manages and controls. This policy provides a framework within which water systems will be managed and sets out key roles and responsibilities for delivery of this policy.

1.2 The Water Safety Management Plan (WSMP) will provide PCH's operational approach and policy implementation plan which will include monitoring and accountability, water safety regime, remediation works and water safety emergency protocols.

1.3 The operational procedures in the WSMP set out how PCH will meet the statutory obligation outlined in this policy, and therefore the WSMP is enforceable through this policy.

2. Introduction

2.1 Legionnaires' disease is a potentially fatal form of pneumonia. People contract Legionnaires' disease by inhaling small droplets of water (aerosols), suspended in the air, containing the legionella bacteria. It is uncommon but can be very serious. It is usually caught when the bacteria have got into the water supply.

2.2 Legionella bacteria can survive under a wide variety of environmental conditions but reproduce to high numbers in stagnant water at temperatures between 20 °C and 45 °C. The organisms will not survive above 60 °C and do not appear to multiply below 20 °C. They may however remain dormant.

2.3 Legionnaires disease is normally contracted by inhaling small droplets of water (aerosols), suspended in the air, containing the bacteria. The risk is increased where:

- a) Water temperatures are between 20 and 45 °C
- b) There are deposits that can support bacterial growth
- c) Aerosol can be produced and breathed in
- d) Employees, residents, visitors etc. are more susceptible to infection due to age, illness, a weakened immune system, and gender, with males being more susceptible than females.

2.4 Water system design and operation, temperature control, treatment and monitoring of the water and recommended cleaning and disinfection procedures must be considered if the risk is to be minimized.

3. Policy Statement

3.1 PCH committed in so far as reasonably practicable to ensuring the health, safety and welfare of persons at its premises. A reasonably foreseeable risk of harm arising from water systems exists in PCH owned and managed properties. PCH accepts that it is the legal Duty Holder for its premises, and has a responsibility to protect its residents, employees, those who work in PCH premises and others from risks associated with water systems.

3.2 The Regulator of Social Housing and Home Standard requires Registered Providers to meet all applicable statutory requirements for the health and safety of residents in their homes, including management of water systems.

3.3 To meet our statutory duties in relation to Water Safety, PCH will follow the Health and Safety Executive's "L8 Approved Code of Practice and Guidance - 2013" (L8 ACOP). To comply with the duties in outlines in the L8 ACOP PCH will:

- Identify and assess the sources of risk.
- Employ suitable qualified and competent contractors to carry out risk assessments, inspections and maintenance on water systems.
- To review risk assessments yearly or sooner if there are changes to the water system or reason to believe that the risk control measures in place are no longer fit for purpose.
- Prepare a scheme (course of action) to prevent or control the risk.
- Implement, manage, and monitor the preventative measures.
- Carry out remedial works recommended by the risk assessor.
- Keep and maintain records of precautions.
- Provide training for those with delegated responsibility.

4. Related Documents

- L8 Approved Code of Practice and Guidance - 2013" (L8 ACOP)
- Health and Safety at Work Act etc. 1974
- HSG 274 Part 2
- Control of Substances Hazardous to Health Regulations 2002
- Management of Health and Safety at Work Regulations 1999
- The Guidance to the Water Supply (Water Fittings) Regulations 1999
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- Housing Act 2004

5. Scope of Policy

5.1 This policy applies to all PCH staff, contractors, and others carrying out works in premises. PCH

5.2 This policy applies to all buildings owned or occupied by PCH or its subsidiary companies. This includes the following location: -

- Rented properties including garages.

- Communal areas
- Offices and storage facilities
- Commercial leaseholders where PCH retains the responsibility to maintain all or part of the building.
- Leaseholders and shared owners, living in self-contained accommodation are responsible for maintaining their water systems.

5.3 We will undertake consultation as required with ‘variable service charge payers’, such as Leaseholders, on a works or contract specific basis where works costs allocated per property are over £250, or £100 per annum under a qualifying long-term agreement. Details and procedures are within the Leaseholder Section 20 Consultation Policy.

6. Roles and Responsibilities

6.1 Board Members

The Board has the overall governance responsibility for ensuring that PCH is compliant with regulatory standards, legislation, and codes of practice. The role of the Board includes:

- Establishing key H&S policies.
- Awareness of risks and risk controls in place.
- Agree performance targets and a performance monitoring framework.
- Ensuring availability of adequate resources and competencies for delivering policy commitments.
- Ensuring appropriate reporting and auditing activity.
- Hearing the voice of residents.

6.2 Under this policy, PCH has identified the following appropriate persons within the organisation to manage this area of risk with the support of appointed specialist contractors. Only competent and licensed contractors will be appointed by PCH.

6.3 Duty Holder

Duty Holder	Chief Executive
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The Chief Executive has ultimate responsibility for health and safety across the organisation and will nominate appropriately qualified and suitable experienced people to discharge those duties in relation to the risk posed by legionella.

6.4 Policy Management and Assurance

Appointed Person	Position:	Executive Director of Homes and Communities
	Responsibilities:	<p>Overall responsibility for the implementation of this policy and ensuring that adequate resources are made available to enable the policy objectives to be met.</p> <p>To ensure that appropriately qualified and suitably experienced people are employed to implement this policy, that appropriate programmes of work are in place to discharge relevant duties</p>
Deputy Appointed Person	Position:	Head of Repairs, Voids & Compliance
	Responsibilities:	<p>Ensuring the WSMP is implemented, relevant, current, and practical.</p> <p>To ensure that all activity required for compliance with this policy is carried out.</p> <p>Provision of quarterly performance reports to the Board as part of the monitoring framework.</p> <p>Reviewing the management plan every 12 months with all relevant parties to ensure the systems outlined in the plan are working.</p>
Competent Person	Position:	Snr Compliance Manager and Water Hygiene Compliance Manager
	Responsibilities:	<p>Administer associated contracts and act as the first point of contact for water safety related queries.</p> <p>Ensure effective management of PCHs' water safety regime and risk register.</p> <p>Ensure that water safety information is available for those carrying out work in PCH properties.</p> <p>Liaising between the employees, contractors, water safety professionals, and residents about matters pertaining to all Water Safety in properties belonging to or managed by PCH.</p>

7. Equality, Inclusion and Diversity Statement

7.1 PCH is committed to valuing and promoting equality and diversity and inclusion across our services. We recognise we have a duty to eliminate unfair treatment and discrimination in the services we provide and to promote and value respect in everything we do. We expect our staff to

share these values and treat all residents with fairness and respect. We also require our contractors and suppliers to mirror our values and comply with our policies in this respect and their own respective duties.

7.2 PCH will apply a zero-tolerance response to acts of discrimination.

7.3 PCH recognises that residents have different needs and may require a tailored and reasonable adjustment to our service to access our services or a property feature, either on a permanent or temporary basis.

7.4 PCH will ensure it meets its duties under the Equality Act 2010 to take into account the need to:

- Eliminate discrimination, harassment, and victimisation.
- Advance equality of opportunity.
- Foster good relations between different parts of the community.

7.5 All contractors employed by PCH or carrying out works on PCH owned or managed premises are required to adhere to the commitments we have made to valuing and promoting equality and diversity and inclusion across our services.

8. Communication

8.1 PCH staff managing contracts on behalf of PCH will ensure that appropriate water safety information is provided to contractors prior to commencement of works.

8.2 PCH will ensure effective emergency procedures are in place and that staff and contractors are clear on their responsibilities.

8.3 PCH will promote water safety awareness through training and induction of relevant staff. The training will be designed to fit the needs and roles of the employees being trained.

8.4 To ensure that appropriate and suitable training is provide to staff, PCH will carry out training needs where appropriate.

8.5 PCH has adopted and is undertaking surveys in accordance with the Regulatory standard tenant satisfaction measures. These will be utilised to address any reports on outstanding works, issues or concerns that warrant further action or learning and will be shared with out contractors delivering services.

Document Control – Change History

Version	Date	Created/Amended By	Purpose
2	April 2024	Head of Repairs, Voids and Compliance	Policy revised to ensure compliance following an external audit review.