

1.0 PURPOSE

1.1 GWHA's Legionella Management Plan (LMP) encompasses the residential stock, commercial premises and offices. It is guided by legislation, regulations and approved codes of practice and will be managed through Legionella Risk Assessments (LRA) and Water Management Systems (WMS) from approved contractors.

2.0 CONTEXT

- 2.1 Legionnaires Disease is a potentially fatal form of pneumonia caused by the inhalation of legionella bacteria. Some groups are at higher risk than others, including;
- (a) people over 45 years old;
 - (b) smokers and heavy drinkers;
 - (c) people suffering from respiratory or kidney disease and
 - (d) anyone with an impaired immune system.
- 2.2 Legionella bacteria commonly occur in both natural (rivers, ponds, lakes, soil, mud and sediment) and artificial water systems within buildings. Of primary relevance to GWHA are:
- (a) Common elements of domestic cold water systems with risk areas being loft located storage tanks,
 - (b) Long term domestic and commercial voids; hot and cold water systems, including shower heads.
 - (c) Office air-conditioning, hot and cold water systems, and water coolers.
- 2.3 Legionella management is part of routine office H&S procedures. Hyndland and Argyle transfers brought additional duties, with Water Management Systems in place for control at these locations. Changes in 2013 to the Legionnaires' Disease Approved Code of Practice (ACOP) mean that any properties with tanks < 300 litres are subject to regulations, this extends to all common elements of GWHA stock and properties that contain cold water storage tanks.

3.0 AIMS

- 3.1 To ensure, as far as is reasonably practicable, that GWHA carries out its operations in a manner that does not affect the health, safety and welfare at work of their employees and non-employees¹.
- 3.2 To demonstrate compliance with legislation, regulations, approved codes of practice and guidance.
- 3.3 To establish robust management systems which ensure transparency, integrity and accountability.
- 3.4 To minimise risk.

4.0 PLAN

4.1 Water Management

- 4.1.1 GWHA has identified the water systems present in our properties and assessed the potential sources of risk. Actions have been identified to supplement existing control measures. (Appendix 3)
- 4.1.2 Legionella risk assessments will be carried out for workplaces by competent individuals/companies accredited to the HSE recommended "Legionella Control Association". All works must be compliant with Control of Substances Hazardous to Health (COSHH) Regulations. The risk assessment will be reviewed at regular intervals (at least every 2 years) or when it is believed that the original risk assessment is no longer valid (e.g. following a change in the building or water supply, or following an incident).
- 4.1.3 On completion of works, new schematic drawings and risk assessments will inform revised WMS and subsequent PI's.
- 4.1.4 For new installations contractors will have appropriate insurances in line with GWHA procurement strategy.

4.2 Monitoring & Recording

- 4.2.1 The risk has been identified and assessed (appendix3), with plans for consultant verification to ensure controls in accordance with the HSE Approved Code of Practice and guidance.
- 4.2.2 In line with Legionella ACOP, legionella records are retained for a minimum of two years.

¹ Tenants, visitors, service users, contractors and members of the general public

4.3 Roles & Responsibilities

- 4.3.1 The Property Services Manager (PSM) has responsibility for ensuring compliance with statutory requirements and for the implementation, monitoring and review of the LMP.
- 4.3.2 The day-to-day management of contracts, registers and works will be undertaken by Property Services / Projects Officers, as appropriate in course of their respective duties.
- 4.3.3 The Health & Safety Administrator is responsible for compliance with H&S legislation within the team, ongoing monitoring of the LMP and will be kept informed of risk assessments, method statements, oversight that routine running of taps / showers to flush systems is undertaken, etc. .

4.4 Staff Training

- 4.4.1 Key staff involved in legionella management will be provided with adequate appropriate training which will be cascaded to allow all staff to undertake their duties effectively and this will be refreshed annually.

4.5 Notifications

- 4.5.1 Where appropriate for comprehensive scope of works a systems knowledge and controls will be provided in advance of works that may impact on existing water systems, to ensure appropriate precautions are implemented and the integrity of the system is retained.
- 4.5.2 If it is suspected or confirmed that a tenant, employee or visitor has contracted Legionnaires ' disease, GWHA will report the incident to the HSE under the Reporting or Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).
- 4.5.3 In the event of there being an outbreak that is traced back to a water system under GWHA control, the Chief Executive and Services Director will immediately be notified and will in turn notify the Scottish Housing Regulator in accordance with guidance on notifiable events.

4.6 Void Properties

- 4.6.1 Empty properties have the potential to exhibit increased risk of Legionella due to the possibility of stagnant water remaining undisturbed within pipework for prolonged periods. Contractors are instructed to flush the system as part of their compliance checks.

5.0 REVIEW

- 5.1 This plan will be reviewed every 5 years, or sooner, subject to a change in legislation or circumstance.
- 5.2 The plan, in parts, attempts to summarise current legislation. In any case of conflict between the two, legislation will always preside.

6.0 DELEGATED AUTHORITY

- 6.1 Delegated authority is granted by the Management Committee to the Chief Executive and Staff to implement this plan and the associated procedures.