

Water Systems (Legionella) Management Policy

Scope of Policy

This policy sets out the strategic arrangements of Platform Housing Group (the Group) and covers the management and control of legionella and other contaminants in water systems in our general needs and specialist housing, including all communal areas/facilities and offices Group wide. Specialist housing is the umbrella term used by the Group which covers supported housing, retirement living and retirement villages.

It ensures compliance with Health and Safety Executive (HSE) documents Approved Code of Practice and guidance - Legionnaires' disease - The control of legionella bacteria in water systems (L8) and HSG274 which states "All systems require a risk assessment but not all systems will require elaborate control measures".

Legionella bacteria are found naturally in water sources. They can multiply in domestic water systems given the right conditions of temperature and nutrients. Inhalation or ingestion of legionella bacteria can cause a potentially fatal form of pneumonia called Legionnaires' disease, as well as other less serious illnesses.

There are other contaminants found in water systems that can be a risk to health. Action to mitigate the risks associated with legionella will also counter the risks associated with other contaminants.

Applicability

The policy applies to all members of the Group.

1. Policy Statement

- 1.1 The Group will do all that is reasonably practicable to protect customers, employees, visitors and neighbours from health hazards arising from the risks associated with legionella bacteria and other contaminants in Group owned or leased premises.
- 1.2 We will comply with our duties for repairs and maintenance as set out in the Landlord and Tenant Act and the relevant Housing Acts and will, in addition, comply with:
 - General objectives of the Health and Safety at Work etc. Act 1974
 - Workplace (Health, Safety & Welfare) Regulations 1992
 - Control of Substances Hazardous to Health 2002 (COSHH)
 - Legionnaires' disease - The control of legionella bacteria in water systems - Approved Code of Practice and guidance (L8)
 - The Water Supply (Water Fittings) Regulations 1999
 - The Notification of Cooling Towers and Evaporative Condensers Regulations 1992
 - Regulator of Social Housing: Safety and Quality Standard - Consumer Standards

- 1.3 We will ensure that employees who are accountable for the management of legionella receive all relevant information, instruction and training and are competent and have the necessary equipment to perform their duties safely and adequately.
- 1.4 We will also require our contractors to abide by all relevant legislation and technical guidance.

2. Context

- 2.1 Legionellosis is the term used for infections caused by bacteria of the genus legionella. The most serious of these diseases is Legionnaires' disease. This is a severe form of pneumonia with a moderately high fatality rate.
- 2.2 Legionellosis is usually contracted via the inhalation of aerosol contaminated with legionella bacteria. However, the individual has to be susceptible for infection.

Studies have shown that only a small number (approximately 5%) of those exposed to the bacteria develop the disease. Some groups of people are, however, at higher risk e.g., those over 45 years of age, smokers, males, heavy drinkers, those suffering from chronic respiratory or kidney disease and people whose immune system is impaired.

- 2.3 Legionella bacteria are naturally occurring and can be found in environmental water sources and can multiply under certain conditions. In particular, water temperatures in the range of 20°C to 45°C favour growth (below 20°C bacteria may remain dormant). The bacteria are unlikely to survive temperatures above 60°C, (destroying 90% of Legionella Pneumophila within approximately 2 minutes) and for this reason stored water should be kept at this temperature.
- 2.4 Criminal liability for a legionellosis outbreak or individual deaths or illness from legionellosis would fall under the Health and Safety at Work Act etc. 1974 (does not apply to domestic premises) and the Control of Substances Hazardous to Health 2002 (COSHH). Failure to comply with these laws is a criminal act that could result in unlimited fines for the Group and possible fines and imprisonment for any Directors or Senior Managers found to be individually culpable.

3. Aims and Objectives

- 3.1
 - Appoint a Duty Holder and Responsible Person to take day to day responsibility for controlling any identified risk from legionella bacteria.
 - Ensure that suitable specialists are appointed to implement preventative measures for elimination of legionella and other water-borne bacteria/contamination to ensure compliance with all relevant legislation.
 - Eliminate or reduce risks wherever reasonably practicable by the procurement of plant, equipment and systems which have been designed to eliminate or control the risks of exposure to legionella bacteria.

4. Policy Outline

4.1 To ensure full compliance with all the statutory requirements of current legislation, standards, code of practice and published guidance, the Group will:

- Undertake a Portfolio Risk Assessment (PRA) for all assets owned or managed by us to identify, where practicable, buildings where conditions may be present that encourage legionella bacteria to multiply and/or disperse and assign the appropriate risk classification to these assets. A risk assessment programme shall then be implemented based on this information.
- Undertake water risk assessments of complex systems (where the system installed serves both communal outlets and outlets installed within domestic locations or is of a high-risk nature due to its design) will be reviewed at least every two years or earlier if there is a reason to believe a risk assessment is no longer valid and are always available for inspection.
- Ensure that the water hygiene programme is in place and considers any acquisitions and disposals.
- Establish and operate a system for recording and controlling risks from legionella bacteria in each/all Group premises.
- Monitor compliance with the control mechanisms and review the performance of the risk control measures.
- Monitor and/or manage sites that are the responsibility of third party stakeholders.
- Ensure that for dwellings left vacant for extended periods of time a suitable drain-down or flushing management regime is put in place to prevent the potential build-up of risk conditions.
- Ensure that an emergency plan is put in place for responding to confirmed legionella outbreaks at any of the sites that we have management responsibility for.

5. Information for Customers and their Responsibilities

5.1 The customer is responsible for reporting any concerns with either their water or water heating systems that we have a duty to maintain. Furthermore, the customer shall assist with access to allow further investigation and remedial works when required.

5.2 We will provide general information for customers, where necessary, regarding water hygiene and keeping their homes safe from the risk of legionella, with the option to contact our Contact Centre to obtain any further guidance as needed.

6. Group Responsibilities and Monitoring

6.1 The Group manages over 50,000 homes from the Derbyshire Dales in the north, to the Cotswolds in the south and from Herefordshire in the west to Lincolnshire in the east. Within this stock, there is a variety of different property types and systems that we

shall need to consider from a risk assessment perspective. To manage water hygiene and associated legionella risks within our stock, we have developed comprehensive procedures and systems to reduce this risk as far as reasonably practicable.

- 6.2 Platform Housing Group is the “Duty Holder” under Health and Safety at Work etc. Act 1974, regarding water hygiene management. The Group Chief Executive emphasises the responsibility is acknowledged and lies at the top of the organisation and is cascaded down through the organisation.
- 6.3 The Chief Investment Officer is appointed to establish and monitor the implementation of the Water Systems (Legionella) Management Policy within the Group. Under his/her control the Property Directorate will implement this policy and ensure that any contractor undertaking risk assessments for this risk shall be trained and competent to do so, holding the relevant Legionella Control Association (LCA) accreditation as required.
- 6.4 The Compliance Manager for Landlord Health and Safety is the “Responsible Person” for all premises that we manage as a Landlord. The Head of Building Safety is the “Deputy Responsible Person”.
- 6.5 The Building Safety Team shall be responsible for the issuing of any legionella risk assessments to the appointed external contractor, they shall also be responsible for managing the findings of any assessments and implementing any control exceptions or remedial works identified within the assessment.

The delivery of any actions identified within a risk assessment may range from either remedial or repair works to ongoing management activities. Due to the wide range in scope, these activities may be delivered via either an external contractor or an employee of the Group, with the Building Safety Team responsible for issuing such works.

- 6.6 Performance reporting for Legionella Risk Assessment compliance is recorded monthly by the Building Safety Team, and reported within Board and Asset & Sustainability Committee reports.

7. Equality and Diversity

- 7.1 We are committed to fairness and equality for all regardless of colour, race, ethnicity, nationality, gender, sexual orientation, marital status, disability, age, religion or belief, family circumstances or offending history, as referred to in our relevant Group policies. Our aim is to ensure that our policies and procedures do not create an unfair disadvantage for anyone, either directly or indirectly.

8. Complaints

- 8.1 We aim to meet the needs of our customers by providing an excellent service. However, it is acknowledged that occasionally things go wrong and customers may

wish to complain. Should the need arise to make a complaint, please refer to our Complaints, Comments and Compliments Policy.

9. Monitoring and Review

- 9.1 This policy will be reviewed every three years or on the introduction of new legislation or best practice guidance, whichever is the sooner.
- 9.2 Individual Building Managers will notify Asset Management immediately that they are aware of any issues of defects with the water management system.
- 9.3 Approved documents are valid for use after their approval date and remain in force beyond any expiry of their review date until an updated version is available.

10. Associated Documents

- 10.1 List of documents - associated policies, procedures and publications:
 - Health and Safety at Work etc. Act 1974
 - Workplace (Health, Safety & Welfare) Regulations 1992
 - Control of Substances Hazardous to Health 2002 (COSHH)
 - Legionnaires' disease - The control of legionella bacteria in water systems - Approved Code of Practice and guidance (L8)
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