



<b>Name of Policy</b>	<b>Legionella Policy and Procedure</b>
<b>Responsible Officer</b>	<b>Property Services Manager</b>
<b>Date Approved by the Management Committee</b>	<b>29<sup>th</sup> June 2022</b>
<b>Date of First Review Approval</b>	<b>26<sup>th</sup> August 2025</b>
<b>Date of Next Review</b>	<b>August 2028</b>
<b>Section</b>	<b>Maintenance</b>

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## **1 Purpose**

- 1.1 The aim of this policy is to ensure the effective, inspection, maintenance and management of all water systems within premises owned by the association.
- 1.2 The procedures detailed within this section have been written to ensure all reasonable steps have been taken to comply with The Control of Substances Hazardous to Health Regulations 2002 (as amended), The Water Supply (Water Fittings) (Scotland) Bylaws 2014, and all other relevant legislation and in line with the following guidance: HSE Legionnaires' Disease – Legionella and Landlords' responsibilities ([hse.gov.uk](http://hse.gov.uk)).

## **2 Definitions**

Legionella "a potentially dangerous type of bacteria when inhaled with water vapour". Bacterium grows best in warm nutrient rich water"

Legionnaires' Disease "a potentially fatal form of pneumonia caused by legionella bacteria".

## **3 Legal Duties**

- 3.1 The Association has several legal duties in relation to managing the risk associated with Legionella. These include
  - Identifying the level and source of risk
  - Formulating a plan to manage that risk
  - Ensuring that the plan is implemented
  - Ensuring that records are kept of actions that are taken

## **4 Legionella Information**

- 4.1 Legionella bacteria is common in natural water such as rivers and ponds. However, legionella can be present by operating other equipment such as cooling towers, central air conditioning equipment, showers, spray apparatus etc.
- 4.2 Legionnaires' Disease can affect anybody but those more susceptible are usually over the age of 45, smokers or heavy drinkers, those with low immune systems, or who suffer from kidney or chronic respiratory disease.
- 4.3 Legionella survive at low temperatures or thrive at temperatures between 20-45°C depending on the conditions – e.g. if there is other bacteria, sludge, scale etc. present.

## 5 Risk Assessment

- 5.1 The Association will assess the risk of exposure to legionella bacteria across its housing stock.
- 5.2 It is important to note that Legionella outbreaks are generally associated with large premises where water storage is of a large capacity and, in addition, the water is normally subject to some form of process i.e. condensing towers, misting equipment, central air conditioning equipment etc.
- 5.3 In the context of the Association's operations it is also important to note that there have been no known recorded cases of legionella outbreaks associated with domestic water systems.
- 5.4 The Association has no stored water systems within its housing portfolio, all water is mains fed and therefore the risk of exposure to legionella bacteria is very low.

*"The risk is further lowered where instantaneous water heaters (for example combi boilers and electric showers) are installed because there is no water storage"*

*"A typical 'low risk' example may be found in a small building (eg housing unit) with small domestic-type water systems, where daily water usage is inevitable and sufficient to turn over the entire system; where cold water is directly from a wholesome mains supply (no stored water tanks); where hot water is fed from instantaneous heaters or low volume water heaters (supplying outlets at 50 °C); and where the only outlets are toilets and wash hand basins". (HSE Legionnaires' Disease – legionella and landlords' responsibilities hse.gov.uk*

## 6 Procedures

- 6.1 The HSE does not expect landlords with such a low risk to take disproportionate measures or spend unnecessary amounts of money on legionella management.  
*"In most cases, the actions landlords need to take are simple and straightforward so compliance does not need to be burdensome or costly. Most landlords can assess the risk themselves and do not need to be professionally trained or accredited" (HSE Legionnaires' Disease – legionella and landlords' responsibilities hse.gov.uk)*
- 6.2 Tenants will be provided with information via newsletters and the website on good water management and legionella.
- 6.3 Tenants will be advised to clean, descale and disinfect shower heads at least every two months and to run showers that are only occasionally used once a week.

- 6.4 When a property becomes void, a plumbing check will be carried out and the shower-head, shower curtain and toilet seat will be changed.

## **7 Notification Requirements**

- 7.1 If it is suspected that a tenant, staff member, contractor or visitor has contracted Legionnaires' Disease, the Association will report the incident to the HSE under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).

## **8 Review**

Both this Policy and the Procedure will be reviewed every 3 years or sooner if there is a change to legislation or if guidance is updated.

## **9 Equality, Diversity and Inclusion**

Trafalgar HA is committed to Equality, Diversity and Inclusion. We strive to be fair in our dealings with all people, communities and organisations, considering the diverse nature of their culture and background and actively promoting inclusion. This policy is in line with Trafalgar's Equality and Human Rights Policy and has been subject to an Equality Impact Assessment.

## Trafalgar Housing Association Equality Impact Assessment



Name of the policy to be assessed	Legionella Policy	Is this a new policy or a revision?	Revision
Person(s) responsible for the assessment	Acting Director		
1. Briefly describe the <b>aims, objectives and purpose</b> of the policy / proposal	To ensure that THA has an effective management system in place to of all water systems within our housing stock and office premises.		
2. <b>Who is intended to benefit</b> from the policy / proposal? (e.g. <i>applicants, tenants, staff, contractors</i> )	Tenants, residents, owners, staff and contractors.		
3. What <b>outcomes</b> are <b>wanted</b> from this policy / proposal ? (e.g. <i>the benefits to customers</i> )	To ensure that THA staff and contractors are aware of the association's legal obligations and that processes are in place to minimise any risks within our housing stock.		
4. Which <b>protected characteristics</b> could be <b>affected</b> by the proposal? (tick all that apply)			
Age    ✓	Disability    ✓	Marriage & Civil Partnership	Pregnancy/Maternity    ✓
Race	Religion or Belief	Gender	Gender Reassignment

Sexual Orientation	
5. If the policy/proposal is not relevant to any of the protected equality groups listed in part 4, state why and end the process here	
6. Describe the <b>likely impact(s)</b> the policy / proposal could have on the groups identified in part 4	This policy is applied equally across all the equality groups identified at part 4; however, those more susceptible to Legionnaires are usually over the age of 45, smokers or heavy drinkers, those with low immune systems, or who suffer from kidney or chronic respiratory disease.
7. What <b>actions</b> are <b>required</b> to address the impacts arising from this assessment? <i>(This might include; collecting additional data, putting monitoring in place, specific actions to mitigate negative impacts).</i>	Given the lack of stored water within our housing stock and action taken at void we would anticipate that any negative impacts are kept to a minimum

Equality Impact Assessment Carried Out by: Alison Leabody

Signed



Job Title: Acting Director

Date Equality Impact Assessment was carried out: 3/6/2025

