LUTON COUNCIL,
BUILDING AND TECHNICAL SERVICES
CENTRAL DEPOT
KINGSWAY
LUTON
LU4 8AU

Housing Asset Management Services

Legionella Policy

Issue 04

DOCUMENT CONTROL			
LEGIONELLA SAFETY POLICY			
Author:	Mark Griggs/Robert Bilston		
Effective from:	13/08/2018		
Owned by:	Housing Asset Management Team		
Issue No:	**1.0**	**Date:**	01/08/2021
Authorised by or in behalf of Duty Holder Signature:		**Colin Moone**	**Service Director**
Issue No:	**2.1**	**Date:**	26/07/23
Authorised by or in behalf of Duty Holder Signature:		**Colin Moone**	**Service Director**
Issue No:	**3.0**	**Date:**	03 July 2024
Authorised by or in behalf of Duty Holder Signature:		**Mark Fowler**	**Deputy Chief Executive/Corporate Director Population Wellbeing**
Issue No:	**4.0**	**Date:**	18 September 2025
Authorised by or in behalf of Duty Holder Signature:		**Roger Kirk**	**Service Director - Property and Construction**

Revision	Date	Description of changes	Was a consultation carried out ? Who	Reviewed by
1.0	01/08/2018	Initial Release	MG (Mark Griggs), RB (Robert Bilston)	
1.1	01/08/2018	Amended/updated	VSRW (Rob Windrum)	MG
2.0	04/08/2021	Update	MG/HA	AK
2.1	02/05/2023	Review	MG/HA	AK
3.0	10/06/2024	Review	MG/HA	HA
4.0	08/09/2025	Review/Update	HA	AK

Legionella Policy & Procedures

Contents

1. Introduction- P5
2. Purpose & Scope- P5
3. Legislation- P5
4. Definitions- P6
5. Responsibilities- P6
6. Water Treatment Service Provider- P9
7. Assessment of the Risk of Legionella- P9
8. Elimination of the Risk of Legionella- P10
9. New, Refurbishment & Remedial Works- P10
10. Procedures for Projects- P10
11. Control of the Risk of Legionella- P10
12. Domestic Cold and Hot Water Systems P11
13 Legionella Testing- P11
14. Single Dwelling Properties- P11
15. Tenants Responsibilities- P11
16. Management Control- P12
17. Monitoring & Review- P12
18. Emergency Procedure- P13
19. Concerns for Legionella Testing- P13
20. Record Keeping Procedure- P14
21. Thermostatic Mixing Valve Testing- P14
22. Training Procedure- P14
23. Policy Monitoring & Review- P14
24. Appendix's P16-P23

1. Introduction

Luton Council has appointed Building & Technical Services (BTS), to manage its commitment to maintaining the Health and Safety of employees, tenants and members of the public and others who may be affected by its business operation against the risk of Legionellosis infection (Legionella), arising from plant, equipment, facilities, work or work-related activities and will implement the procedures in this document to ensure this responsibility is met. The Council will take all reasonable, practicable steps to ensure that appropriate management systems are in place to ensure employees and tenants of the public are not put at risk from the effects of Legionella.

2. Purpose and Scope

This Policy and Procedure sets out the strategy BTS Luton Council will follow and includes the framework of the procedures for achieving and maintaining it. This framework defines the stages and describes the objectives at each stage, specifies the management, operational and specialist responsibilities, and lays down a clear management and communication structure to ensure that it is effective and that it fails safe, wherever practicable.

This Legionella policy shall be implemented and maintained in alignment with the duties placed on duty holders under the Building Safety Act 2022. Any Legionella-related risks identified that could impact the structural or fire safety of a higher-risk building will be reported, managed, and, where applicable, escalated in accordance with the provider's Building Safety Policy, including Mandatory Occurrence Reporting requirements

3. Legislation

It is the Policy of Luton Council to follow the HSE guidance entitled Legionnaire's Disease: The Control of Legionella bacteria in water systems, Approved Code of Practice and Guidance (known as ACOP L8).

It is the Policy of Luton Council to comply with the following other applicable Legislative controls:

- Health and Safety at Work Act 1974
- Control of Substances Hazardous to Health Regulations 2002
- Management of Health and Safety at Work Regulations 1999
- Building Safety (England) Regulations 2022
- Reporting Injuries, Disease and Dangerous Occurrences Regulations 1995
- Notification of Cooling Towers and Evaporative Condensers Regulations 1992 (Not currently applicable)
- Safety Representative and Safety Committee Regulations 1977
- The Health and Safety (Consultation with Employees) Regulations 1996
- British Standards and all applicable guidance for the control of Legionella and the installation of water systems.
- The Corporate Manslaughter and Corporate homicide Act 2007
- Water Supply (water fittings) Regulation 1999

4. Definitions

For the purposes of this policy and procedure, the following definitions apply.

Aerosol means minute droplets of water or the residue from their evaporation, which are so small as to remain suspended in air with negligible falling velocity.

Cooling Tower and Evaporative Condenser omit- means heat rejection devices as defined in the *Notification of Cooling Tower and Evaporative Condensers Regulations 1992*:
"Cooling tower means a device whose main purpose is to cool water by direct contact between that water and a stream of air".

"Evaporative condenser means a device whose main purpose is to cool a fluid by passing that fluid through a heat exchanger which is itself cooled by contact with water passing through a stream of air".

Duty Holder means the senior executive with management responsibility, for and on behalf of an organisation, for ensuring the activities of that organisation do not constitute an undue risk to health, safety and welfare and that the organisation does not breach any related legal duties.

Fail safe means a practice, procedure, precaution or other stratagem, which is designed to default to a safe condition.

L8 means the combined Health and Safety Commission approved code of practice and Health and Safety Executive guidance *Legionnaires' disease the control of legionella bacteria in water systems*.

Legionella means any bacteria of the *Legionella* genus

Legionellosis means an infection caused by *Legionella* and includes Legionnaire's Disease, Pontiac Fever and Lochgolihead Fever.

Responsible Person means the head of the division/service that holds the day to day responsibility for ensuring the delivery of the content of this policy across the organization. It is also a term used for the person in charge on individual sites.

Responsible Manager means the operational officer for managing the implementation and services for the control of *Legionella* across the organisations housing property portfolio and instructing building managers and relevant persons in the council's procedures and controls.

5. Responsibilities

Lines of Responsibility

Luton Council own or manage a wide ranging property portfolio with complex lines of management. The duty to maintain and implement the *Legionella* policy falls under the remit of the **Housing Asset Team** in the directorate of the **Customer and Commercial.** The

responsible manager will implement the control schemes as detailed in this document reporting to the **Responsible Person and/or Duty Holder**. (**See Appendix 1**)

Duty Holder

The Duty Holder has a responsibility to support this policy by ensuring the allocation of resources including an adequate budget, suitable and sufficient equipment, personnel, time and training.
In particular, they will:
- Eliminate risk where reasonably practicable.
- Appoint appropriate 'Responsible Persons' to oversee, control and coordinate the management of any residual risk to as low as reasonably practicable for Legionella.
- Ensure that there are adequate resources available to manage any legionella residual risks

The Duty Holder is: **The Chief Executive:**

The Responsible Person

The 'Responsible Persons' have been given their authority by the Duty Holder. The position carries with it the authority to put into effect such measures as are required to manage any residual risks in Legionella safety, both as a matter of routine and in the event of a crisis. The 'Responsible Person' has a duty to ensure that Luton council's policy, procedures and all relevant legislation associated with the management and control of Legionella are adhered to.
The 'Responsible Person' also has a responsibility to ensure records are kept to confirm that this policy has been implemented. The 'Responsible Person' has the overriding authority for the management of Legionella control. They have the authority to instruct and enforce where necessary a 'Jointly Accountable Responsible Person' to ensure that all Luton Council sites meet the requirements of legislation and the provisions of this policy.

The 'Responsible Person' is required to ensure that 'Jointly Accountable Responsible Person's' are trained and competent to carry out the prescribed task on their behalf and to ensure that the 'Responsible Person's' tasks and requirements are duly met.
The 'Responsible Persons' have the authority to appoint a 'Responsible Manager' and 'Jointly Accountable Responsible Manager'. The 'Responsible Manager' and 'Jointly Accountable Responsible Manager' has/have been given their authority by the 'Responsible Persons' to act on their behalf to oversee the day-to-day management of Legionella control for Luton Borough Council, designated by the 'Responsible Person'. The 'Responsible Person' is required to ensure that the 'Responsible Manager' is trained and competent to carry out the prescribed task on their behalf and to ensure that the 'Responsible Person' tasks and requirements are duly met.
The 'Responsible Person' for the management of Legionella control within Luton Borough Councils housing property portfolio is:
The Corporate Director of Customer and Commercial Department.

Jointly Accountable Responsible Persons for Luton Borough Councils Housing property portfolio is **Housing Asset Manager**

The 'Jointly Accountable Responsible Person' assumes the same duties as the 'Responsible Person' delegated by the Responsible Persons. The 'Responsible Person' is available to assist and offer advice to enable 'Jointly Accountable Responsible Persons' meet their duties.

The ‘Jointly Accountable Responsible Person’ for the management of legionella safety within Luton Borough Councils ‘-Housing property portfolio is: **The Service Director of Housing**

Responsible Manager

The ‘Responsible Manager’ has been given their authority by the ‘Responsible Person’ or by the ‘Jointly Accountable Responsible Person’ to act on their behalf to oversee the strategic management of Legionella control for Luton Borough Council, designated by the ‘Responsible Person’, has responsibility for overseeing and coordinating the Policy and Procedure. This position carries with it the authority to put into effect such measures as are required to manage risks in Legionella control both as a matter of routine and in the event of a crisis.

The ‘Responsible Manager’ also has a responsibility to ensure records are kept to confirm that this policy has been implemented. They have the responsibility for the management including ensuring that the scheme of precautions to control the risk of Legionellosis is implemented fully by competent persons, whether directly employed by Luton Borough Council, contracted or subcontracted.

In particular they will:

Oversee the control and management of Legionella on behalf of the Duty Holder

- Ensure that legionella risk assessments are carried out on behalf of the Duty Holder
- Eliminate risk where reasonably practicable
- Control risk where elimination is not reasonably practicable, by devising and implementing a scheme of precautions
- Arrange maintenance, monitoring and management of the precautions controlling the risk, including reviewing the risk assessment regularly, periodically or as required.
- Arrange the procurement of competent help, as required, including ensuring that the organisations and individuals deployed are competent and appropriately trained and experienced
- Keep records
- Manage the duties in respect to the implementation and management of this policy to the Facilities Management team

The Responsible Manager is **Service Head**

Jointly Accountable Responsible Manager

The ‘Jointly Accountable Responsible Manager’ assumes the same duties as the ‘Responsible Manager’ delegated by the Responsible Persons. They also have the duties to work more closely operationally to assist in fulfilling the requirements of the relevant legislation.

The ‘Responsible Manager’ is available to assist and offer advice to enable ‘Jointly Accountable Responsible Manager’ meet their duties.

The ‘Jointly Accountable Responsible Managers’ for the management of legionella safety within Luton Borough Councils ‘-Housing property portfolio is the **Housing Asset Manager- and Building Services Manager**

6. Water Treatment Service Provider

A Water Treatment Service Provider will be appointed at all times and has responsibility for the supply of water treatment chemicals, information on their application, an analytical service and such advice and support as may be necessary to ensure safe and effective water treatment. The Water Treatment Service Provider is responsible for providing the Responsible Manager with advice and guidance on relevant regulations applicable to the housing stock. The Water Treatment Service Provider has responsibility for carrying out routine cleaning and disinfection of relevant plant, equipment and facilities, or accepting that this has been carried out satisfactorily by others. The Water Treatment Service Provider may also be requested to carry out the routine tasks such as temperature recording, flushing of little used outlets. They will record these findings and submit them to the Responsible Manager to maintain the records for BTS. **(See Appendix 2 for Chlorination Procedure)**

7. Assessment of the Risk of Legionella

The Responsible Manager will commission a risk assessment in line with the Health and Safety Commission's ***Approved Code of Practice (ACOP L8): Legionnaires' disease – The Control of Legionella Bacteria in Water Systems*** with an appropriately competent contractor to assess the risk of legionella, on all plant, equipment, facilities, and, as appropriate, work and work-related activities. This risk assessment shall provide the information required by the Responsible Manager, under the authority of the Duty Holder, to decide:

- Where the risk is negligible and likely to remain so.
- Where the risk is significant but can be eliminated.
- Where the risk is significant but can be controlled.
- Where the risk is significant but cannot be controlled.

IF THE RISK ASSESSMENT IDENTIFIES SIGNIFICANT RISK OF LEGIONELLA, WHICH CANNOT BE CONTROLLED, THE PLANT, EQUIPMENT, FACILITY, WORK OR WORKRELATED ACTIVITY SHALL BE SUSPENDED UNTIL A SAFE MEANS OF OPERATION HAS BEEN DEVISED AND IMPLEMENTED.

Where suspension of the plant, equipment, facility, work or work related activity is required, the Responsible Manager will issue formal notification to the site management of any required remedial actions on behalf of the Responsible Person. The Responsible Manager and the site Management will formulate an action plan to manage site conditions, including staff and public awareness as required. The requirement of both site management and staff to adhere to both the Responsible Persons and the Responsible Managers instructions is absolute. The Responsible Manager will issue further formal notification that any suspended plant, equipment, facility, work or work related activity can be re-used, once any issues are satisfactorily resolved. The legionella risk assessment shall be carried out in a methodical and structured way to comply with the requirements ACOP L8 and shall include consideration of the following:

- The likelihood of *Legionella* contamination at source, or on site;
- The conditions prevailing to take account of the likelihood of *Legionella* proliferating;
- Aerosol generation, dissemination and exposure; and
- The likely susceptibility of those exposed.
- A full schematic drawing of the water system.
- An asset list of all the water services referenced against the council's

8. Elimination of the Risk of Legionella

Where the risk assessment identifies a risk that is significant, all reasonably practicable (see HSE website for further definition of '*reasonably practicable*') measures shall be taken to eliminate that risk.

In summary, reasonable practicability includes consideration of what is practicable (feasible) and, in relation to all actions that are practicable, whether they are reasonable when the quantum of the assessed risk is measured against the sacrifice (whether in money, time or trouble) involved in the feasible measures necessary to eliminate the risk.

9. New, Refurbishment & Remedial Works

All new and/or remedial works carried out in LBC properties shall from the outset be designed to minimize the risk of colonization and proliferation of Legionella and will comply to the guidance in this policy and will follow the guidance as detailed in the Health and Safety Executive guidance Legionnaires disease the control of legionella bacteria in L8 shall be clearly detailed and a suitable explanation using alterative guidance shall be cited. Supervisors of any works affecting water supply are to be satisfied and qualified to assess L8 compliance and ensure works are carried out to regulations.

NOTE: All fittings, materials and equipment used within LBC premises shall be WRAS approved.

In domestic water systems flexible couplings also known as tap connectors and/or tails have been shown in tests to reduce the effectiveness of treatments against Legionella including temperature control and biocide treatments and increase the risk of Legionella proliferating. Whilst the use of WRAS approved flexible couplings is accepted in guidance and standards, Luton Council policy is not to use these fittings unless there is no other method of connecting the outlet to the domestic water supply.

10. Procedures for Projects

All new water systems or modifications will be designed, constructed and installed in accordance with current legislation. British Standards, CIBSE TM13 and ACOP L8. In order to ensure a consistent and compliant standard of delivery for all alterations to the Council's property Portfolio, all projects that affect water services are to be carried out in compliance with ACOP L8 regulation and Council Policy and Procedures. The Responsible Manager is to be notified of the changes to the water services/system and where guidance or clarification is required. Any such changes will require a new Legionella risk assessment to be carried out as part of the project.

11. Control of the Risk of Legionella (See Appendix 3)

Where the risk assessment identifies a risk that is significant and it is either not practicable (not feasible) but not reasonable to eliminate that risk, **a written scheme of precautions shall be devised and implemented to control that risk.**

12. Domestic Cold and Hot Water Systems

Risk

The ideal growth temperature range for Legionella bacteria is 20-45°C. Temperatures between 20-45°C are not unusual in poorly managed or poorly specified water systems. However temperatures between 38-43°C are also found in TMV's (Thermostatic Mixing Valves).

The combination of the above temperature range, coupled with the presence of scale, debris and stagnation within a hot water system will result in *Legionella* growth, where the Legionella bacteria* is present.

*Legionella bacteria occur naturally in locations such as rivers, lakes, and reservoirs, it is also present in very small quantities in the mains water supply. In Luton Council premises these small quantities in the mains water supply can multiply to dangerous levels in and unmanaged water system.

Control

A Water Treatment Services Provider will be appointed to monitor and treat the water systems in accordance with the ACOP L8 guidelines.

13. Legionella Testing

As standard practice the testing for *Legionella* bacteria **will not** be carried out as a standard measure except for cooling towers and properties that have increased or perceived greater risk of being colonized and/or where there is a recognised higher risk group of users within or using those premises. *Legionella* testing **will** be carried out at properties where the usual control measures have failed and/or at premises which have had a previous test result returned as positive for the *Legionella* bacteria. BTS may carry out testing to affirm measures are adequate. **(See Appendix 4)**

14. Single Dwelling Properties

Single dwelling properties that have cold water storage cisterns are not routinely tested for legionella as the risks from hot and cold water systems in most residential settings are generally considered to be low owing to regular water usage and turnover. A typical 'low risk' example may be found in a small building (e.g. housing unit) with small domestic-type water systems, where daily water usage is inevitable and sufficient to turn over the entire system (In line with HSE guidance). These properties are on a cyclical boiler replacement program that allows us to remove the cold water storage cisterns and replace the dwelling with a Combination Boiler. Where a combination boiler is not viable the cold water storage cistern will be replaced to current regulation. If a tenant has any concerns with water hygiene these properties will be surveyed and addressed as per procedure.

15. Tenants Responsibilities

Tenants are required to comply fully with any advice given regarding legionella prevention or water hygiene.
The Council accepts no responsibilities for testing or water management arising out of tenants own activities.

16. Management Control

The risk assessment, elimination of risk, devising and implementing the scheme of precaution and coordinating competent individuals for each aspect shall be effected by the Jointly Accountable Responsible Manager.

All foreseeable contingencies are to be considered and procedures are to be devised which fail safe, rather than unsafe, wherever practicable. For each foreseeable significant deviation from normal and satisfactory operation, there is to be a plan of action for correcting the fault and demonstrating that this has been effective.

BTS employees are to report any Legionella or water hygiene issues to the Jointly Accountable Responsible Manager as soon as they occur.

Responsible Person's Management Review Meeting

The Responsible Manager will hold regular meeting with the Jointly Responsible Manager to formally understand any issues that have arisen and to sanction, where appropriate, remedial actions that may be required. Meetings will be part of the Health & Safety Board with any actions or improvements raised there. If the situation requires the Responsible Manager will convene emergency meetings with the responsible person as situation dictates.

17. Monitoring and Review (See Appendix 5)

Where the risk assessment identifies a risk which is negligible and likely to remain so, the risk assessment shall be reviewed periodically or as and when changes to the water system, management or building users occurs.

Where the risk assessment identifies a risk which is significant and can be eliminated, the risk assessment shall be reviewed once the elimination has been effected.

Where the risk assessment identifies a risk which is significant and can be controlled, that risk assessment shall be reviewed once the controls have been implemented or whenever there is a change, which may affect the risk.
Where elimination of a negligible risk is practicable (feasible) but not reasonable for reasons of cost, that reasonability study shall be reviewed whenever significant expenditure (such as for renovation) is considered.

Risk assessments, practicability studies and schemes of precautions where there is no reason to suppose there has been any relevant change shall be reviewed (but not necessarily repeated or redrafted) in two years.

Those with responsibilities within this policy (Operators, Water Treatment(Duty Holder, Responsible person/Responsible Manager, Advisers, appointed Contractors) Service Provider, Advisors, Responsible Manager, Responsible Person and Duty Holder) shall report via the lines of communication to ensure that control measures are implemented, monitored to confirm their effectiveness and managed to maintain control of the risk of Legionellosis and that risk assessments, practicability studies and schemes of precautions are reviewed in accordance with this policy.

Unless particular local conditions or findings of the risk assessment demand otherwise, monitoring shall be as advocated by

- The HSE in ACOP L8 (Table 2.1 in HSG 274 part 2 and Checklists 1, 2 and 3), or

- The HSE in HSG 282 The control of legionella and other infectious agents in spa-pool systems or
- To a higher standard.

18. Emergency Procedure (See Appendix 6)

Failing Temperature Control
Where it has been recorded that the temperature control for water systems have fallen outside of the agreed parameters, the Responsible Manager will investigate and take appropriate action to remedy. Where a one off fault has been identified and the rectification has resulted in the correct temperatures being achieved, no further action will be taken. If temperature control consistently fails and the fault cannot be rectified, the Responsible Manager will report to the Responsible Person. Legionella sampling will be instigated and maintained until the system fault can be rectified or until an approved alternative control measure has been implemented and shown to be working.

Shutdown/Mothballing of Premises (See Appendix 7/8)
Where premises are not used for prolonged periods, they will not be re-occupied again until a re-commissioning process has been implemented. That process will be site specific and must be clearly specified before implementation.

Legionella Bacteria Detected in a Water System
Where a test for Legionella has been carried out and returned as positive then the Responsible Manager shall notify the Responsible person and the appropriate Jointly Accountable Responsible Person immediately they are aware. They will carry out a risk assessment of the building and its users to determine the next course of action which could be but not limited to, a complete flush through of the water system, pasteurisation of the water system, chlorination of the water system or engineering solutions to remove potential problem to the system. The additional use of continuous biocide treatment and/or point of use filtration may also be considered on a temporary or permanent basis. Where a positive result has occurred, sampling for the Legionella bacteria will be repeated following remedial works to confirm that those works have resolved the issue. A further failure at this time will necessitate that this procedure be repeated.

BTS call centre and Stand-By Team have a procedure in place whereby if an emergency occurs with legionella they will have the relevant contact details of personnel who can provide immediate guidance and instigate an action plan. Water service provider to follow procedures as this will be in line with the Public Health England (PHE) Outbreak Control Plan see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/961760/guidance_on_investigating_cases_clusters_and_outbreaks_of_legionnaires_disease.pdf

19. Concerns for Water Quality Reports (See Appendix 9)

If a tenant reports a concern for the quality of water BTS will carry out an assessment, and where deemed appropriate, arrange for a specialist contractor to be sent out within two working days to take water sample at the property. The samples will be

sent to an authorised laboratory for testing for Legionella. On receipt of the results BTS will write to the tenant with results and advice and where necessary arrange remedial works.

20. Record Keeping Procedure- Sheltered Accommodation

The Responsible Manager shall keep appropriate records to confirm that the monthly monitoring, risk assessments, chlorination and elimination or control of the risk has been effected fully by competent individuals. All files to be returned to BTS and stored for 5 years.

Record Keeping Procedure-High-Rise Blocks
The Responsible Manager shall keep appropriate records to confirm that the risk assessments, chlorination and elimination or control of the risk has been
Effected fully by competent individuals. All files to be returned to BTS and stored for 5 years.

Record Keeping Procedure- Domestic Properties
The Responsible Manager shall keep appropriate records to demonstrate domestic properties have been subjected to a dwelling type and water system risk assessment. This will determine if further inspection/action is required. Void properties to have a basic Legionella risk assessment carried out prior to re-letting.

21. Thermostatic Mixing Valve Testing (TMV) (See Appendix 10)

Where TMV's are fitted requiring servicing and/or maintenance, BTS
Will arrange for a competent operative to attend and carry this out. Thermostatic Mixing Valve Procedure to be followed regarding access.

22. Training Procedure (See Appendix 11)

All manual operatives carrying out works to water systems will attend Water Regulations Advisory Scheme (WRAS) course as mandatory training and Operatives Legionella training provided by request or management instruction. This is to be carried out by an external training provider. In house training for legionella awareness events will take place to ensure that all relevant staff members are appropriately trained with refresher courses yearly.

23. Policy Monitoring and Review

The Responsible manager has overall responsibility for taking all reasonable steps to ensure that this policy is complied with and will conduct audits on annual basis to measure compliance at all Luton Council sites and record the results. They will also issue a report on behalf of the Duty Holder to the senior Executives and recommend actions in order to continue the development of the Risk Management Program.

The policy should be formally reviewed and updated every two years by the Responsible Manager, or sooner if deemed appropriate, or by reasonable request.

24. Outside Taps in Sheltered Schemes

Outside taps should be kept to a minimum but were deemed necessary installed where practical to minimise the risk of legionella.
Taps to be installed with a lockable isolation valve and a double check valve as close to branch as possible.
Taps to be fitted with signage as per Appendix 2 and notice displayed on the notice board on use of external taps and hosepipes and risk if legionella as per Appendix 3.
Taps to be isolate in October and chlorinated and reinstated in April and flushed on a monthly bases while in use by water hygiene contractor and documented.

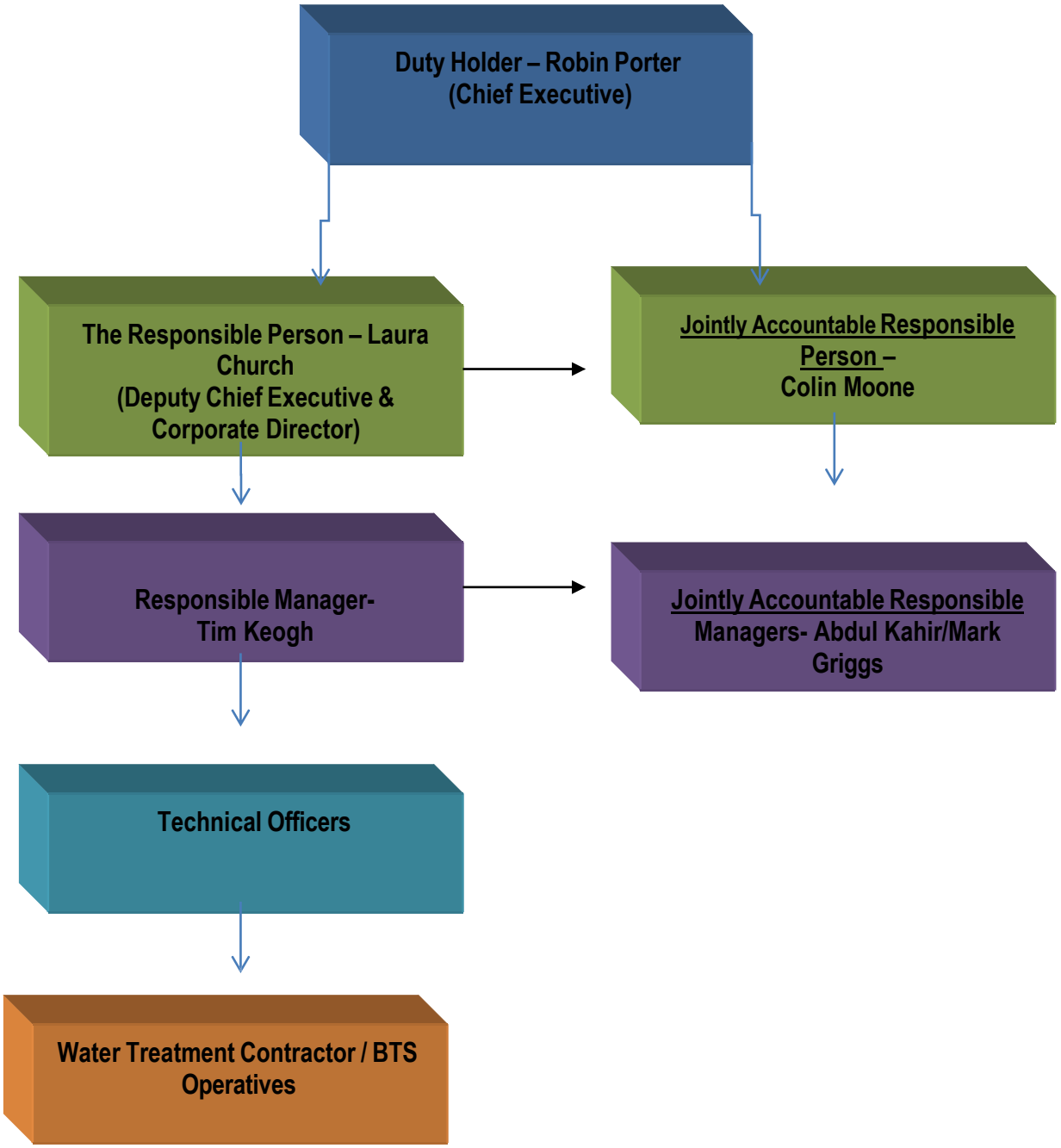
Appendices

BTS : Building & Technical Services

Luton

Appendix 1

Management Chart



Appendix 2

Luton

Caution

Outside taps and hosepipes carry a
Risk of Legionella

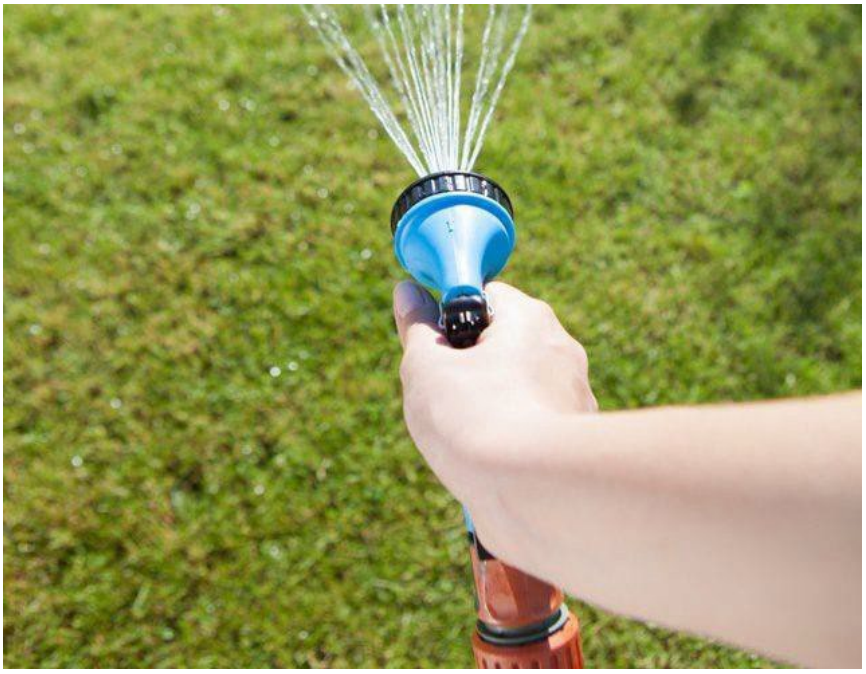
The following advice can help to minimise this risk:

- Run tap slowly for 2 minutes. ✓
- Avoid creating any spray or mist. ✓
- Disconnect and empty hose after use. ✓
- Store hosepipe out of sunlight and in a cool place. ✓
- Avoid storing any water in the garden. ✓

See noticeboard for more information.
Call BTS for Legionella advice or to report a concern – 0800 0147 333

Appendix 3

KEEPING YOU, YOUR HOSEPIPE AND OUTDOOR TAPS SAFE.



The humble hosepipe can sometimes harbour harmful levels of *Legionella* if not looked after and used properly.

What is Legionnaires' disease?

Legionnaires' disease is a rare form of pneumonia; we call it an atypical type of pneumonia because along with respiratory symptoms people infected often become very ill, very quickly. They may also get symptoms of diarrhea and sometimes

confusion too. It also does not respond to the normal type of antibiotics given for pneumonia.

How do you get it?

The usual route of infection is from inhalation of water droplets (less than 5 microns). These droplets can come from all forms of water applications including turning on a shower, tap, flushing a toilet, or using a spa pool, hot tub or other activities which cause am aerosol of water – such as a hosepipe.

Here are some simple tips to keep you safe:

- Legionella likes to grow in water (and sometimes potting composts) in nice warm conditions ie. over 20°C and below 50°C It needs nutrients and in particular likes to grow on wet surfaces in a slime layer.
- It's not practical to attempt to drain a hosepipe after every use but keeping it somewhere cool and out of the sun will help to reduce the risk of the bacteria thriving in your hosepipe.
- Because it's main route of infection is by people inhaling aerosols formed from a spray, when you come to use the hosepipe again just gently run the water out of the hose – without any form of spray attachment on the end.
- Don't use a hosepipe that has been sitting around and full of warm water to fill a hot tub – the warm water within the tub

will allow any bacteria – including *Legionella* – to quickly grow.

- Run your outdoor tap(s) slowly, to avoid creating an aerosol spray, for a period of 2 minutes to ensure any stagnant water is cleared.

Procedures of Chlorination

Inspection, isolation, draining and manual clean and chlorination of water tanks in accordance with HSE ACOP L8 Approved Code of Practice, BS8558 and procedures as specifically laid out in HSE ACOP HSG274 Part 2 sec 2.137.

A supply of water must be maintained at all times to the Tenants dwellings by means of connecting a temporary water tank to the service outlets.

- Each Tenant must to be notified directly by the contractor by letter informing them of the dates and times and access requirements 7 days prior to any works proceeding.
- Upon completion of the works each dwelling and communal area water supply is to be tested to ensure correct operation.
- Following the clean and chlorination to ACOP L8 specification of the water tanks a further low level chlorination at a level safe and suitable for use as potable water shall be completed, this shall be maintained and distributed to all dwellings for a 24 hour period.
- Service the ball valves of each tank and replace any defected parts as required.
- A report and certificate of chlorination to be issued upon completion of the works, this to include photographic records of pre and post works.
- Upon completion of the works the contractor must have a 24 hour contact telephone number with a one hour response time in case of emergency loss of water to rectify anything related to the works.

Full job specific method statements of the works, COSHH Assessments specific to the chemicals being used and Risk Assessments and provision of Membership of the Water Management Society to be issued prior to the start of any work

Appendix 3

Control Procedure In communal areas located across High Rise Blocks, Sheltered Housing & Booster plant.

All Water Services	- A risk assessment on each system to be carried out and reviewed at least every two years or earlier if- - Significant changes have been made to a system e.g. remedial works have been implemented. - Significant change has occurred in way a system is being used e.g. a formerly occupied building is now only partially occupied. - Changes have been made to the management and/or maintenance of the system e.g. 6 months after a new maintenance company has been appointed. - The results of checks indicate that control measures are no longer effective - A case of legionnaire's disease is associated with the system. - There is new information about risks or control measures.	Initial Risk Assessment Reviewed every year (two years maximum)	
Hot Water System	Arrange for samples to be taken from hot water calorifiers in order to note condition of drain water	Annually	

Hot Water System	Check and record temperature in flow and return pipe work at calorifiers.	Monthly	
Hot Water System	Check and record water temperature by running the water for up to one minute to see if it has reached a minimum of 50°C in the sentinel taps. If TMV's are present then temperature must be taken from the hot supply pipework that feeds the TMV via a surface probe.	Monthly	
Hot Water System	Check and record representative number of taps for temperature (as above) on a rotational basis. If TMV's are present then temperature must be taken from the hot supply pipework that feeds the TMV via a surface probe.	Monthly	
Hot Water System	Visual check on internal surfaces of Calorifiers for scale and sludge. Check representative taps for temperature as above	Annually	
Hot Water System	On a rotational basis, check thermostat settings and adjust if required. Check pump/s for correct operation	Monthly	
Cold Water Services	Check and record water temperature remote from cold water storage tank outlet or incoming mains temperature at ball vale. Note maximum temperatures recorded by fixed max/min thermometers where fixed.	Monthly	
Cold Water Services	Check and record that temperature is below 20°C by running the water from tap for up to two minutes from the sentinel taps.	Monthly	

Cold Water Services	Check and record representative number if taps for temperature (as above) in a rotational basis. To ensure that all taps are checked at least once a year	Monthly	
Cold Water Services	Visually inspect cold water storage tanks and carry out remedial work as necessary.	Annually	
Thermostatic Mixing Valves	TMV's should be serviced annually and a representative number checked monthly on a rotational basis to ensure they are operating with the design specifications	Monthly	
Shower Heads	Dismantle, clean and de scale shower heads and hoses	Quarterly or as necessary	
Little-used outlets	Flush through and purge to drain or purge to drain immediately before use, without release of aerosols	Monthly	

BTS : Building & Technical Services

Luton

Appendix 4 Properties Schedule Table

Property Type	Biannual Risk Assessment	Yearly Chlorination	Monthly Monitoring	Legionella Sampling
Single Dwelling Domestic Property				**When Requested if tenant fears Legionella issue or as a void property.**
High Rise Blocks	✓	✓	✓	✓ **1 Year**
Sheltered Housing	✓	✓	✓	✓ **1 Year**
Booster Plant	✓	✓	✓	✓ **1 Year**

Low rise Blocks -*T*hese properties are on a cyclical boiler replacement program that allows us to remove the cold water storage cisterns and replace the dwelling with a Combination Boiler. Where a combination boiler is not viable the cold water storage cistern will be replaced to current regulations. 10 % of the low rise blocks that are in our housing stock that have storage cisterns will have a visual inspection and a legionella sample taken and recorded. This allows us to use budget most efficiently.

Appendix 5

Sheltered Accommodation & High Rise Blocks Monthly Monitoring/Water Hygiene Procedure

Monitoring of water temperatures, water quality of buildings water tanks all Water services throughout dwellings at sentinel points.
To include: monthly flushing; Supply and completion of record books; monthly bullet pointed reports; water sampling.

- Monitoring of all cold water storage tank temperatures, communal sentinel hot and cold water outlet temperatures and hot water cylinder flow, return, pre and post TMV3 temperatures at all sites where applicable to the sentinel test point.
- Record and report monthly on all water temperatures in record log books to be supplied to BTS.
- Complete a monthly bullet point report highlighting any issues noted during monthly monitoring procedures.
- To complete a monthly flush of all little used water outlets at all sites.
- Supply like for like showerheads for communal shower/salon areas to be swapped with existing units in order to descale existing showerheads quarterly.
- To take random Legionella water samples 6 monthly of hot and cold water outlets at all sites.
- To take a Legionella sample of a cold water storage tanks at all Sheltered/High Rise blocks annually,
- To clean & chlorinate hot and cold water pipework to ACOP L8 specification, conduct and supply a risk assessment and take a Legionella water sample in voids.
- Water Hygiene issues reported across all housing stock: Contractor to attend property within two working days to take water sample. The samples to be sent to an authorised laboratory for testing. On receipt of the results BTS will write to the tenants with results and advice and where necessary arrange remedial works

Appendix 6

Legionella Emergency Action Plan Procedure

Upon notification of a suspected Legionella outbreak being reported by a resident(s) of Luton Borough Council, the following course of action should be taken.

1. Be aware that this **does not** immediately indicate that the resident(s) have contracted it from a Luton Council Premises, this disease can be contracted from many external sources, so the issue should be dealt with in an internally discreet manner without causing concerns to other residents or initially including external parties which may cause unnecessary complication, this controlled manner will in turn ensure the matter is dealt with swiftly and without long term disruption to the building water supply.

2. Immediately contact the Responsible people within Building Technical Services on the contact numbers here below, who will in turn contact Helmore Industrial Water Treatment directly, who will then instigate its own action plan to deal with the issue.

   1) Building Services Manager: Mark Griggs 077668 00779
   2) Technical Officer: Dave Smith 07710 385 515
   3) Duty Manager: 0800 014 7333

   In the case that the responsible people from BTS cannot be contacted, then and only then contact Helmore Water Treatment directly on the contact numbers listed here below.

3. **Helmore Contact Details:**
   Weekdays: (9am to 5pm) **01462 895588**
   Weekends: (9am to 5pm) **07778 381851**
   Out of hours emergency number: 07513 281837

4. BTS working alongside Helmore Water Treatment will ensure supplies of water for drinking and ablutionary purposes will be supplied where required.

5. BTS will advise if there is any need to stop or just restrict the use of any water in the suspected area or householder's property.

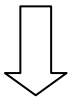
Appendix 7

Procedure for void water safety properties exceeding 28 days

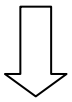
Void team to notify Client and Mechanical team as soon as an upcoming void is scheduled confirm how many days has the property been vacant.



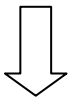
On possession of a void, voids team to turn the mains water off from the isolation valve and notices to be posted “Water not to be used”



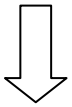
Clearance of the void to be completed by Building & Technical Services.



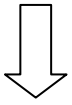
Clean and Chlorination of mains, hot water and tank *(if applicable)* to be carried out Water Service Provider. A legionella water sample must be retrieved after this process has been completed.



Water risk assessment to be completed at the time of the Clean and Chlorination works.



Report and certificate for the works completed to be issued upon completion deeming the water safe to use *(Legionella results to be issued once received from laboratory)*.

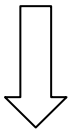


Void Team to flush water system on a weekly basis until void is let to new tenant. Correct breathing apparatus to be used to prevent breathing in any water vapers

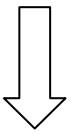
Appendix 8

Procedure for void water safety properties less than 28 days

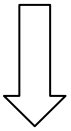
Void team to notify Client and Mechanical team as soon as an upcoming void is scheduled confirm how many days has the property been vacant.



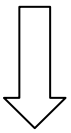
On possession of a void, voids team to turn the mains water off from the isolation valve and notices to be posted “Water not to be used”



Clearance of the void to be completed by Building & Technical Services.



Water risk assessment to be completed by and passed to Client and Mechanical team to store.



Void team to flush water system on a weekly basis until void is let to new tenant. Correct breathing apparatus to be used to prevent breathing in any water vapers.

APPENDIX 9

Water Quality Issue

Tenant raises concerns about water quality by calling emergency repairs number

⇩

BTS to contact Water Hygiene contractor and contractor to attend within 2 working days

⇩

Contractor to take water samples and send to laboratory for a Legionella test

⇩

Laboratory to contact contractor and contractor to contact BTS Heating/Mechanical Team with result.

Negative Result

BTS to contact tenant with result and advice via letter.

⇩

No further action required.

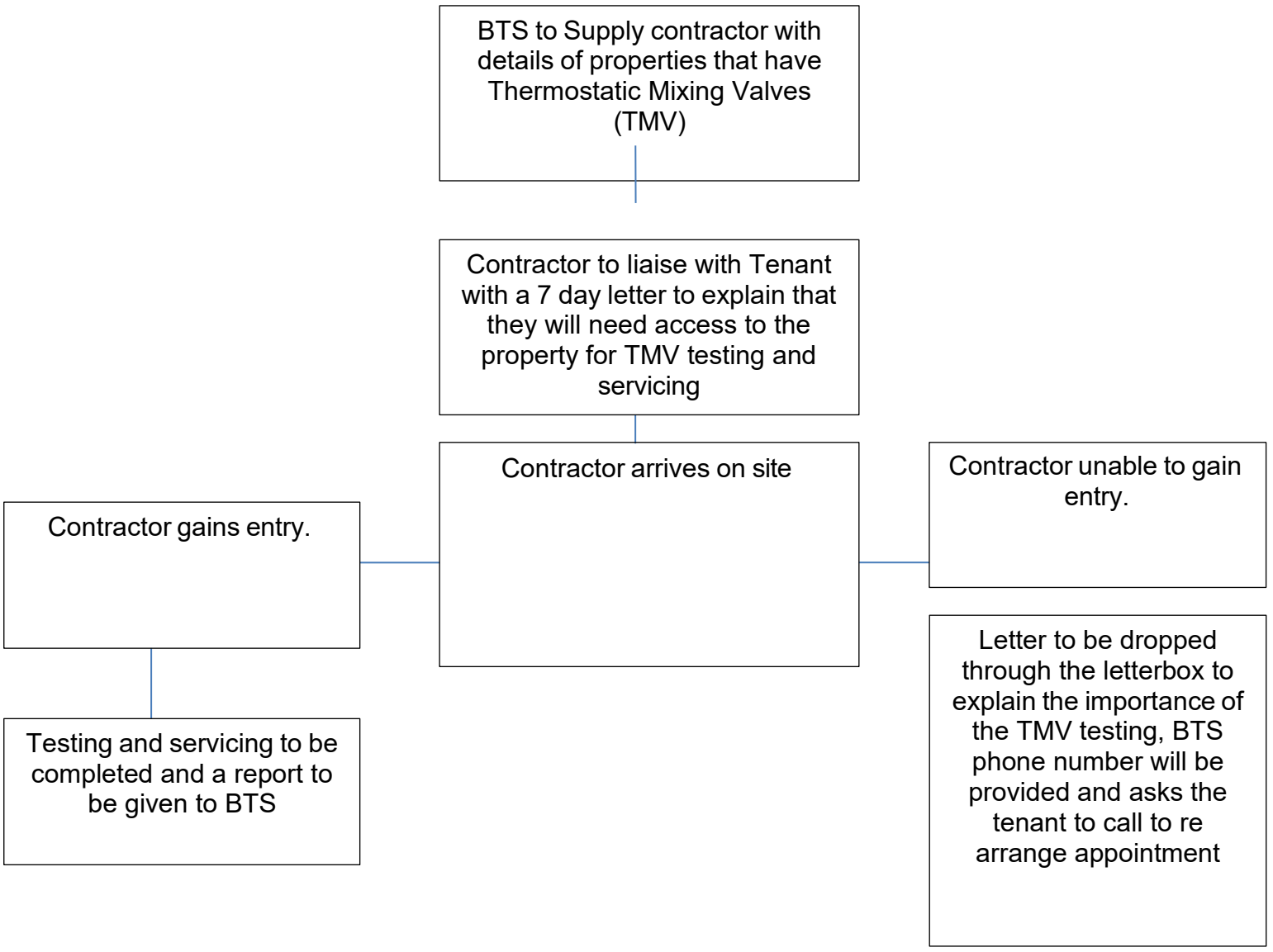
Positive Results

Tenant to be advised what the next procedure will be. Contractor to attend property with an action plan to clear issue.

⇩

Risk assessment to be completed via contractor to avoid returning issue.

Thermostatic Mixing Valve Servicing Procedure



Appendix 11

Training Procedure

- The Responsible Person will ensure that time and allocation of resources is provided to the Responsible Manager to keep up to date with all current legislation and recommendations of statutory responsibility.
- The Responsible Person will ensure that the **Legionella Policy** is distributed to all within Luton Council who have a duty to manage premises or may have cause to carry out works or actions that may affect water systems or the management thereof.
- The Responsible Manager will organise Legionella awareness-training to ensure the Jointly Accountable Responsible Persons are appropriately trained.
- The Responsible Manager will also ensure that their management team is appropriately trained to undertake Legionella management on behalf of Luton Borough Council
- All manual operatives carrying out works to water systems will attend Water Regulations Advisory Scheme (WRAS) course as mandatory training and Operatives Legionella training provided by request or management need.
- For Legionella Outbreak Control Measures

  https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/961760/guidance_on_investigating_cases_clusters_and_outbreaks_of_legionnaires_disease.pdf