



# RCH Policy: Legionella Management 2023-2026

Policy Owner

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Approval Body

RCH Board

Approval Date

26<sup>th</sup> September 2023

## Contents

1. Scope .....	3
2. Introduction.....	3
3. Policy Statement and Responsibilities.....	4
4. Equality Impact Assessment .....	5
5. Review.....	5

This policy is available, on request, in different languages and in other formats such as large print, audio format and braille as required.

## 1. Scope

This is a River Clyde Homes (RCH) policy and therefore applies to Staff, Board, Committee members of River Clyde Homes and contractors including RCH subsidiary company Home Fix (Scotland) Ltd .

## 2. Introduction

This policy document is to ensure that RCH fully complies with their responsibilities under the guidance – Control of Legionella Bacteria in Water Systems – Approved Code of Practice and Guidance HSG274.

The main aim of this Policy is to ensure, so far as reasonably practicable, that control measures and procedures are in place to prevent tenants, staff, contractors, and members of the public being exposed to legionella.

RCH has also prepared relevant documents available to staff and / or the public to view:

- RCH Legionella Written Scheme:

<..\..\Legionella RCH Written Scheme\Current\RCH Legionella Written Scheme - KM - version 11 - Final.docx>

- Legionella – Housing Safety Guide:

<..\..\..\..\Routine Works\TENANT INFORMATION LEAFLETS\HOUSING SAFETY GUIDE\14838 RCH Housing Safety Guide.PDF>

RCH recognises its responsibility to ensure that an effective Legionella Written Scheme is in place to promote the safety and security of tenants, owners, staff and users of its homes and buildings and to protect the asset value of those buildings it owns and manages. Operation of the Policy ensures the RCH Group meets its legal requirements under Legionella. The principal legislation and HSE guidance in this area is as follows:

- Approved Code of Practice (ACOP) L8 (4<sup>th</sup> Edition 2013) Legionnaires' disease, the control of legionella in water systems.
- HSG 274 (Part 2, 2014) Legionnaires' disease, the control of legionella bacteria in hot and cold-water systems.
- The Health and Safety at Work Act 1974
- The Control of Substances Hazard to Health Regulations (COSHH) 2002
- The Management of Health and Safety at Work Regulations 1999
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013

### 3. Policy Statement and Responsibilities

RCH recognises its legal responsibilities, to take all reasonable precautions to prevent or control the risks to staff, tenants and others from exposure to Legionella bacteria. To comply with its legal duties RCH will:

- Adopt the guiding principals set out in relevant Approved Code of Practice
- Identify and assess sources of risk
- Appoint a Responsible Person to take responsibility for controlling any identified risk
- Clearly define the organisational arrangements for achieving compliance (see RCH Legionella Written Scheme)
- Aim to prevent the risk of Legionella, so far as reasonably practicable
- Where an identified risk cannot be prevented, prepare, implement and manage a written control scheme (or course of action) for controlling risk
- Keep records and check that what has been done is effective
- Ensure resources are made available to achieve compliance
- Ensure all personnel involved in the management of legionella risks are appropriately informed, instructed, and where necessary, trained and supervised
- Promote awareness within the wider RCH Group community of the hazards presented by Legionella bacteria
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RCH is considered to be the Duty Holder under the Approved Code of Practice (ACOP) and Guidance (L8) and the **Chief Executive** is responsible for undertaking and delegating the duties under this Guidance. These roles are delegated in accordance with the guidance below:

**Directors** are responsible, so far as reasonably practicable, for ensuring the health, safety and welfare at work of all employees in their respective departments. Where they are responsible for staff or operatives who may be required to deal with Legionella they will:

- Ensure that resources are made available to enable suitable arrangements for the management of Legionella.
- Ensure appropriate training, information and instruction is provided for relevant employees and operatives in the form of training courses, seminars, information leaflets and booklets and personal instruction as appropriate; and
- Ensure that where specialist technical expertise in relation to legionella is not available within the department, suitable arrangements are in place to obtain any necessary information as required.

The **Senior Asset and Compliance Manager is the Responsible Person for Legionella** and will be responsible for:

- Undertaking risk assessment of RCH properties to ensure that suitable management procedures are implemented for the management of Legionella.
- Ensuring the accuracy of the RCH Legionella Written Scheme and ensure it will be maintained and current.
- Liaising with external consultants to ensure that suitable management arrangements are in place for the monitoring of RCH properties.
- Liaising with the Housing teams to identify void properties that require to be assessed and the programme of Legionella checks on all RCH properties; and
- Ensuring all contractors including RCH subsidiary company, Home Fix Scotland Ltd operatives have carried out the required training for the role they are undertaking

RCH employees will be responsible for:

- Complying with the RCH Legionella Written Scheme and Policy

#### **4. Equality Impact Assessment**

RCH will apply this policy fairly and consistently. In implementing this policy, we will not directly or indirectly discriminate against any persons or group of people because of their race, religion or belief, gender, disability, age, sexual orientation, or any other grounds. Our commitment to equality and fairness will apply irrespective of factors such as age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity, race, religion or belief, sex, sexual orientation, or other personal attributes.

#### **5. Review**

This policy will be reviewed in its entirety every 3 years, unless an earlier review is required due to changes in legal, regulatory or best practice requirements, or because monitoring and reporting reveals that a change in policy is required sooner.