



**Legionella
Policy**
February 2026

Document Details	
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Date Created:	
Date of Last Review:	March 2023
Date of Next Review:	February 2029
Review Remit:	Management Committee
Consultation:	Internal

Regulatory Standards Mapping		
✓	1	The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users.
✓	2	The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users and stakeholders. And its primary focus is the sustainable achievement of these priorities.
	3	The RSL manages its resources to ensure its financial well-being, while maintaining rents at a level that tenants can afford to pay.
	4	The governing body bases its decisions on good quality information and advice and identifies and mitigates risks to the organisation's purpose.
	5	The RSL conducts its affairs with honesty and integrity.
✓	6	The governing body and senior officers have the skills and knowledge they need to be effective.
	7	The RSL ensures that any organisational changes or disposals it makes safeguard the interests of, and benefit, current and future tenants.

Core Objective Mapping	
	Provision of affordable social housing
	Local control and accountability
✓	Efficient local service provision
	Viability
	Equality of opportunity for all customers
✓	Legal and regulatory compliance

Governance

HR

Property

Housing &
Factoring

Finance & IT

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Purpose

Overview and Principles

- 1.1 The aim of this Policy is to ensure the effective inspection, maintenance and management of all water systems within premises controlled 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) Byelaws 2014;
 - Health and Safety Approved Code of Practice L8: Legionnaire's Disease: The Control of Legionella Bacteria in Water Systems;
 - All other relevant legislation.

Legal Duties

- 1.3 The Association has several specific legal duties which relate to water safety and, in particular, Legionella risk management. These include:
 - Identifying and assessing sources of risk;
 - Preparing a scheme for preventing or controlling the risk;
 - Implementing and managing the scheme;
 - Keeping records and checking what has been done is effective.

Legionella Information

Background

- 1.4 Legionella bacteria occur naturally in water but can multiply in man-made systems such as cooling towers, showers, spray devices, and hot/cold water systems.
- 1.5 Legionnaires' disease is a severe pneumonia caused by inhaling contaminated water droplets (aerosols) from sources like showers, taps, or humidifiers. Related conditions include Pontiac Fever and Lochgoilhead Fever.
- 1.6 Legionella survive at low temperatures and thrive between 20°C and 45°C, especially where nutrients like rust, sludge, or scale are present.
- 1.7 Anyone can be affected, but higher risk groups include people over 45, smokers, heavy drinkers, and those with chronic illness or weakened immunity.

Objectives

- 1.8 The Association will aim to minimise and control the risk from Legionnaires' disease, and to this end will:
 - Identify and assess sources of risk (e.g. where conditions are present that may encourage Legionella bacteria to multiply or where there is a means of creating and disseminating breathable droplets) and establish any items of non-compliance.
 - Assess the level of risk through a structured Legionella Risk Assessment programme and aim to eliminate or reduce the risk to an acceptable level.
 - Arrange for routine inspection and maintenance of water systems where a level of risk of medium or above is identified, and where needed, a programme of treatment.
 - Retain records of maintenance, inspection and testing for a minimum of 5 years.

Cold Water Storage Tanks

1.9 Legionella risk is to be managed via a programme of works scheduled by the Property Services Team, where every year each property identified on the contractual program of works will require an annual inspection and audit.

1.10 The following tasks will be undertaken in line with the Association's main Legionella contractor:

Year 1

- Comprehensive risk assessment and inspection of all cold water storage tanks
- Water sampling for Legionella and indicator organisms (E. coli, coliforms, TVCs)
- Immediate remedial works where required (e.g., cleaning, disinfection, insulation, fitting screens)

Year 2

- Implementation of selected recommendations from contractor reports, prioritised by best value and Common Close repair thresholds (per Deed of Conditions)
- Works requiring owner approval will be scheduled following consultation

1.11 All inspections and remedial actions will be documented in the Legionella Risk Log, with records retained for a minimum of 5 years.

Water Fittings

System Requirements

- 1.12 The Association will ensure that all water fittings comply with relevant legislation and have the CE mark, British Standard kitemark or appropriate equivalent. Specialist advice will be obtained in the selection of all water systems fixtures and fittings.
- 1.13 The Association will ensure that all water fittings are suitable for the purpose intended.
- 1.14 Hot water shall be stored in tanks at a temperature of at least 60°C, and hot water taps shall reach temperatures greater than 50°C within 1 minute of running.
- 1.15 Cold water shall be stored at a temperature of less than 20°C. Cold water shall reach taps at temperatures less than 20°C within 2 minutes of running.
- 1.16 Water pipes shall be as short and direct as possible, and pipes and tanks will be effectively insulated. Tanks will be protected against contamination and materials used which do not encourage Legionella growth. 'Dead legs' will be removed where practicable.
- 1.17 Where water is used or stored for consumption in any devices, e.g. water coolers, tea urns, drinks machines etc., an effective system of regular cleaning and disinfecting shall be introduced, in accordance with manufacturer's instructions.

Risk Assessment

- 1.18 The Association commissions H2O Legionella Control Services for its mainstream tenemental Stock, Aquatronic Group Management ('**AGM**') for the new build stock at 1265 Argyle St. 58 & 60 Lymburn St., and Kilbarchan Maintenance Service (formerly Cocoon Environmental Safety) to undertake legionella prevention measures in our housing and office buildings.
- 1.19 The Association's Health and Safety Administrator will periodically arrange for a Legionella Risk Assessment for the Association's office premises (which is considered a low-risk environment), and maintain a water monitoring regime. A formalised legionella control scheme is also in place within the office.
- 1.20 High-risk environments generally applies to premises such as hospitals, or buildings with cooling towers – neither of which are applicable to the Association.
- 1.21 Risk re-assessment will be undertaken every 2 years, or sooner if changes necessitating re-assessment occur earlier.

Treatment

- 1.22 Water services will be treated when any of the following situations occur:
- After any prolonged shutdown of a month or longer (a risk assessment may indicate the need for cleaning after a period of less than one month, especially in summer where temperatures have been high);
 - If the system or part of it has been substantially altered or entered for maintenance purposes in a manner that may lead to contamination;
 - Following an outbreak or suspected outbreak of Legionnaires' disease or any other water borne infection/disease.
 - We will obtain a post-treatment/post-disinfection bacteriological sample where relevant.

Void Property Actions

- 1.23 It is recognised that all void properties have the potential to exhibit increased risk of Legionella due to the possibility of stagnant water remaining undisturbed within pipework for prolonged periods. To mitigate the increased potential risk associated with voids, the contractor appointed to carry out repairs on all standard properties will carry out and record the following:
- Thoroughly flush all taps;
 - Clean and disinfect – or replace – all shower heads;
 - Inspect and report on water storage tank, where present;
 - All actions will be recorded and retained as evidence prior to re-occupation where practicable.
- 1.24 All special lets becoming void will be assessed individually and on their own merits.

Responsibilities

Staff, Contractor and Tenant

Contractors

- 1.25 A competent external contractor will be appointed to carry out legionella preventative monitoring and water hygiene services. As a minimum requirement, contractors are required to be a registered member of the Legionella Control Association ('**LCA**') or the Water Management Society ('**WMSoc**').
- 1.26 Contracted works may include legionella sampling, tank inspections, water sampling, (for all bacteria) and other associated services, as identified in the Legionella Risk logs. The performance of Legionella contractors will be monitored through regular review of reports, outcomes and compliance with contractual requirements.

Staff

- 1.27 The Association recognises that the effective management of Legionella risk relies on clear lines of responsibility, appropriate competence, and effective oversight. The following roles have been established to ensure compliance with statutory and best-practice requirements.

Chief Executive

- 1.28 The Chief Executive has overall responsibility as the Duty Holder for ensuring that the Association complies with relevant health and safety legislation relating to Legionella and water hygiene. This includes:
- Ensuring adequate resources are available to manage Legionella risk;
 - Confirming that suitable governance, monitoring and assurance arrangements are in place;
 - Receiving reports on significant risks, incidents or areas of non-compliance where required.

Deputy Chief Executive

- 1.29 The Deputy Chief Executive is responsible for the operational oversight of health and safety arrangements, including Legionella control, and will:
- Provide senior management oversight of Legionella risk management;
 - Ensure appropriate escalation of significant risks or incidents;
 - Support the Chief Executive in discharging the Association's statutory duties.

Property Services Manager

1.30 The Property Services Manager is designated as the Responsible Person for Legionella management and has direct responsibility for the implementation and day-to-day management of this policy. Duties include:

- Ensuring Legionella risk assessments are undertaken, reviewed, and kept up to date;
- Ensuring remedial works and control measures are implemented in a timely manner;
- Appointing and managing competent external contractors for Legionella services;
- Reviewing monitoring reports, water sampling results and risk logs;
- Ensuring appropriate records and certification are maintained;
- Escalating material risks or non-compliance to senior management.

Property Services and Project Officers

1.31 Property Services and Project Officers are responsible for ensuring that Legionella considerations are incorporated into capital projects, major works and new properties, support the delivery of Legionella controls including:

- Liaising with contractors to facilitate inspections, sampling and remedial works;
- Arranging access to properties and communal areas;
- Ensuring actions arising from risk assessments are completed;
- Updating Legionella risk logs and associated property records;
- Reporting any defects, adverse test results or access issues to the Property Services Manager;
- Ensuring new or altered water systems are designed and installed in accordance with relevant legislation and best practice;
- Confirming that post-completion Legionella risk assessments are undertaken where required;
- Coordinating remedial works or system improvements arising from project activity.

Property Services Assistant

1.32 The Property Services Assistant provides administrative support for Legionella management and is responsible for:

- Maintaining records of inspections, risk assessments, monitoring and certification;
- Ensuring documentation is stored securely and is readily retrievable;
- Supporting reporting and audit processes as required.

All Employees

1.33 All employees have a responsibility to co-operate with the Association's Legionella procedures and must:

- Follow relevant training and guidance;
- Report any concerns relating to water safety or system defects;
- Support access and information sharing where required.

Guidance and Communication

Tenants & Customers

2.1 Incident response and statutory notification arrangements are detailed in Section 13 of this Policy. However, in terms of advice from the Association to its residents, the following applies:

- Tenants will be advised to clean shower heads, descale and disinfect them at least every two months;
- For showers that are only occasionally used, tenants are advised to flush the shower through by running the water for at least 2 minutes once a week.
- Where a property is left vacant for any extended period of time (e.g. when on holiday), tenants are advised to flush both hot and cold-water systems by running all outlets for at least 2 minutes.
- **Tenants should inform the Association immediately if there are problems, debris or discolouration in the water.**

Incidents, Escalation and Notification

Incident Identification

3.1 An incident includes, but is not limited to:

- A suspected or confirmed case of Legionnaires' disease associated with premises controlled by the Association;
- Positive Legionella sampling results above acceptable thresholds;
- Failure of key control measures (e.g. inability to achieve required water temperatures);
- Significant defects or contamination within water systems;
- Any situation where there is a reasonable belief that occupants, staff or visitors may be at risk.

3.2 All staff; contractors and tenants are required to report concerns immediately upon becoming aware of them.

Immediate Actions

3.3 Where a Legionella-related incident is suspected or identified, the following immediate actions will be taken:

- The issue will be reported without delay to the Property Services Manager (Responsible Person);
- Interim control measures will be implemented as advised by the competent Legionella contractor (e.g. temporary isolation, flushing, disinfection, temperature control);
- Relevant records, sampling results and risk assessments will be reviewed to establish the extent of risk.

Internal Escalation

3.4 The Property Services Manager is responsible for coordinating the incident response and will:

- Assess the level of risk in consultation with the Association's Legionella contractor;
- Inform the Deputy Chief Executive of any significant incident, adverse sampling result or system failure;
- Escalate matters of high risk, confirmed infection, or regulatory involvement to the **Chief Executive** without delay;
- Maintain a detailed incident record including actions taken and outcomes.

Statutory Reporting

- 3.5 Where required, the Association will notify the appropriate enforcing authorities in accordance with statutory requirements, including:
- Reporting confirmed or suspected cases of Legionnaires' disease under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR);
 - Liaising with the Health and Safety Executive (HSE) and Public Health Scotland as appropriate and the Scottish Housing Regulator;
 - Providing access to records, risk assessments and monitoring data on request.
- 3.6 The responsibility for statutory notification rests with the Chief Executive, supported by the Deputy Chief Executive and Property Services Manager.

Communication and Stakeholder Liaison

- 3.7 Where necessary, the Association will:
- Communicate with affected tenants, staff or visitors in a clear and timely manner;
 - Liaise with medical, environmental health, or public health bodies as required;
 - Ensure communications are proportionate, factual and coordinated through senior management.

Investigation and Follow-Up

- 3.8 Following any Legionella-related incident, the Property Services Manager will ensure that:
- A formal investigation is undertaken to identify root causes;
 - Risk assessments are reviewed and updated where required;
 - Remedial works and preventative measures are implemented;
 - Lessons learned are documented and, where appropriate, incorporated into procedures or training.
- 3.9 A summary of the incident and actions taken will be reported to senior management and, where appropriate, the Management Committee.

Training

Staff Training

- 4.1 Where significant risk has been identified, and control measures need to be in place, Yorkhill Housing will ensure suitable and sufficient training of staff to support them with their responsibilities in water hygiene.
- 4.2 Employees will receive suitable instruction and awareness training appropriate to their job role and responsibilities as defined in the 'Staff, Contractor and Tenant Responsibilities' section of this Policy.

Review

Policy Review

- 5.1 The Association will review its methodology for managing Legionella every three years or sooner if required by Statutory or best practice requirements. The outcome of policy reviews will be checked by Senior Management and presented to the Management Committee.

Definitions

Terminology Glossary

Legionella: *“a potentially dangerous type of bacteria when inhaled with water vapour. Bacterium grows best in warm, nutrient rich water.”*

Legionella Risk Assessment: *“a specific risk assessment carried out to determine the risk level of Legionella Assessment proliferation, and exposure from a specific water system.”*

HSE: *“The Health and Safety Executive (HSE) is the national independent watchdog for work-related health, safety and illness. It acts in the public interest to reduce work-related death and serious injury across all workplaces.”*

Logs: *“a record to record all local checks and tests carried out, as specified by legionella risk assessment.”*

Legionnaires' disease: *“a potentially fatal form of pneumonia caused by the legionella bacteria.”*

References

- BS 8580-1:2019 – Water Quality: Risk Assessment for Legionella
- HSG Health and Safety in Residential Care Homes (2001)
- HSG274 Legionnaires Disease – Technical Guidance (2024)
- IACL27 (rev2) Legionnaires Disease – A guide to Employers
- INDG 458 Legionnaires Disease – A brief Guide for Duty Holders (2012)
- Public Health etc. (Scotland) Act 2008
- The Building (Scotland) Regulations 2004
- The Control of Substances Hazardous to Health Regulations 2002, as amended
- The Housing (Scotland) Act 2006
- The Management of Health and Safety at Work Regulations 1999
- The Private Water Supply (Scotland) 2006
- The Water Supply (Water Fittings) (Scotland) Byelaws 2014
- The Water Supply (Water Quality) (Scotland) Regulations 2001

Equalities

Impact Assessment

Yorkhill Housing Association Equality Impact Assessment Tool			
Name of Policy/proposal to be assessed	Legionella Policy	Is this a new policy or a revision?	Revision
Person responsible for the assessment.	Robert Calvert, Property Services Manager		
Briefly describe the aims, objectives and purpose of the policy.	This policy details the Association's obligations, approach, lines of task delegation and response procedures towards the presence of Legionella in its housing stock and office premises.		
Who is intended to benefit from the policy/proposal (e.g. applicants, staff, tenants, contractors).	Residents and Association staff through the effective safeguarding measures in place regarding water hygiene.		
What outcomes are wanted from this policy/proposal (e.g. the benefits to customers).	<ul style="list-style-type: none"> Clearly defined responsibilities and approach methods towards managing Legionella A commitment to maintaining effective communication with residents on the topic Safe and compliant housing stock 		
Which protected characteristics could be affected by the proposal? (tick all that apply)			
<input checked="" type="checkbox"/>	Age	<input checked="" type="checkbox"/>	Disability
<input type="checkbox"/>	Marriage/Civil Partnership	<input type="checkbox"/>	Pregnancy/Maternity
<input type="checkbox"/>	Race	<input type="checkbox"/>	Religion or Belief
<input type="checkbox"/>	Gender	<input type="checkbox"/>	Gender Reassignment
<input type="checkbox"/>	Sexual Orientation		
Describe the likely positive or negative impact(s) the policy/proposal could have on the protected characteristics identified.	Positive impact	Negative impact	
	<p>Legionella, if present, may pose an increased risk towards those who are elderly, immune-compromised or who have certain disabilities.</p> <p>Effective Legionella management helps protect these vulnerable groups of people.</p>		
What actions are required to address the impacts arising from this assessment? (This might include; collecting additional data, putting monitoring in place, specific actions to mitigate negative impacts).			