



## **Legionella & Water Safety Policy**

If you need this policy in another format, for example larger print, audio format, Braille, Dyslexia friendly or in another language, please contact us.

## **1. Purpose of Policy**

Argyll Community Housing Association (ACHA) is committed to ensuring the health, safety and wellbeing of tenants, employees, contractors and visitors by effectively managing the risk of exposure to Legionella bacteria and other waterborne pathogens.

ACHA recognises its statutory duties under health and safety and public health legislation and will:

- Undertake suitable and sufficient risk assessments
- Implement proportionate and effective control measures
- Maintain clear governance and reporting arrangements
- Monitor compliance through defined performance indicators
- Provide assurance to the Board of Management and regulators

This Policy establishes the governance and accountability framework illustrated within the Water Safety Management Structure diagram and is supported by the Water Safety Management Plan.

The purpose of this Policy is to:

- Define ACHA's governance arrangements for water safety
- Establish accountability at every level of the organisation
- Ensure compliance with statutory and regulatory requirements
- Embed a proportionate, risk-based management approach aligned with ACoP L8
- Provide assurance to the Board of Management

## **2. Scope**

This Policy applies to all premises and water systems under ACHA's control, including:

- General needs housing
- Sheltered and amenity housing
- Offices, depots and workshops
- Mixed tenure properties where ACHA retains responsibility for communal systems
- Temporary accommodation

The policy covers:

- Hot and cold domestic water systems
- Stored water systems
- Associated plant and equipment
- Communal distribution systems

### **3. Key Legislation**

ACHA manages water safety in accordance with:

- Health & Safety at Work etc. Act 1974
- Management of Health & Safety at Work Regulations 1999
- Control of Substances Hazardous to Health Regulations 2002 (COSHH)
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Public Health etc. (Scotland) Act 2008
- Approved Code of Practice L8 (4th Edition)
- HSG274 Parts 1–3
- BS 8580-1:2019
- Water Supply (Water Fittings) Regulations 1999
- Scottish Housing Regulator Regulatory Framework

### **4. Policy Statement**

#### **4.1. Management Structure**

ACHA operates a defined governance structure for water safety as illustrated in the Management Structure Diagram. This structure establishes clear lines of accountability from strategic oversight through to operational delivery.

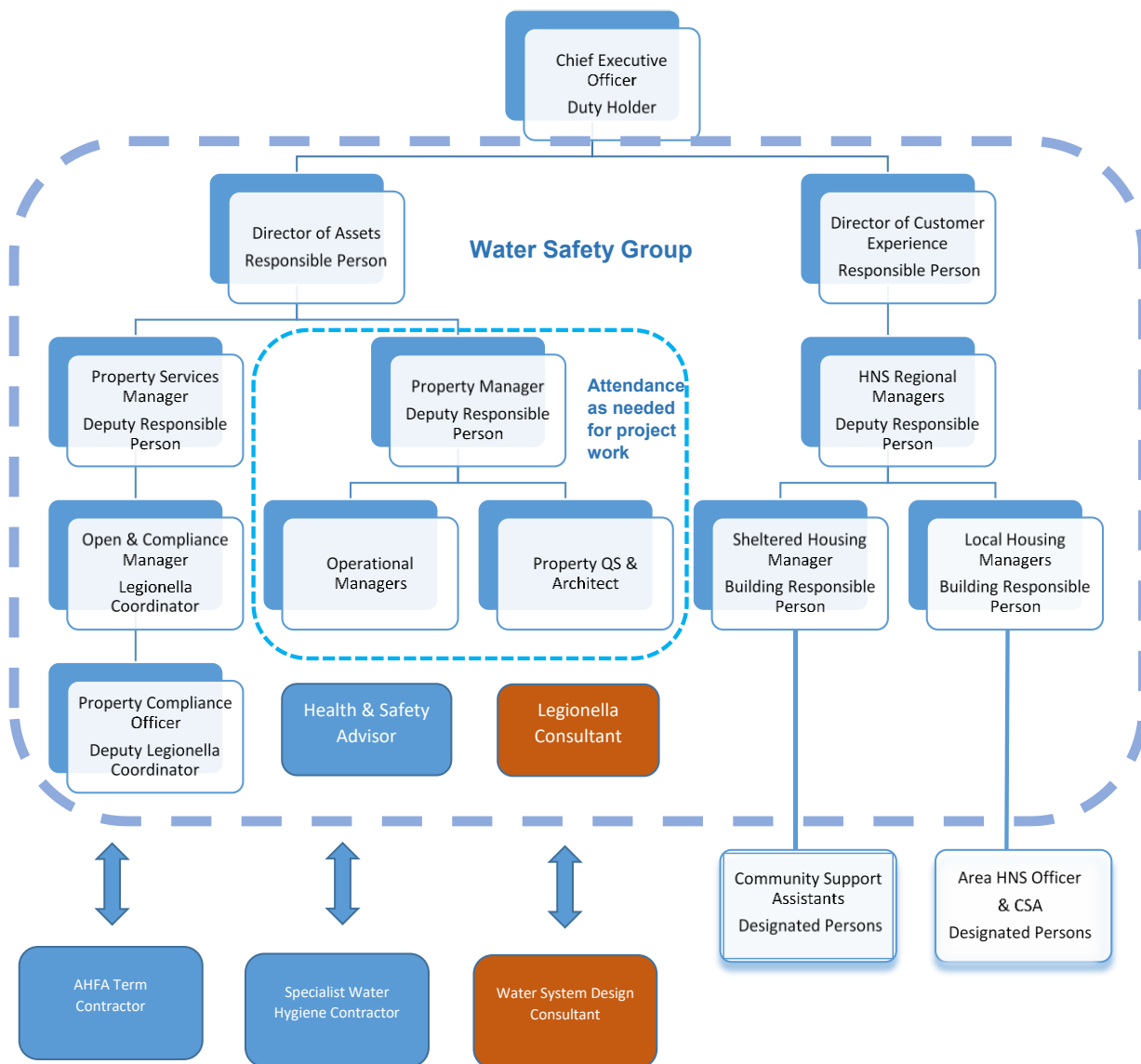


Fig.1 Management Structure

## 4.2. Board of Management

The Board provides strategic oversight of water safety compliance and will:

- Receive annual compliance assurance
- Review significant risk or incident reports
- Ensure adequate resources are available
- Seek assurance that statutory obligations are met

## 4.3. Chief Executive (Duty Holder)

The Chief Executive is the appointed Duty Holder and retains ultimate accountability for water safety compliance. The Duty Holder will:

- Appoint Responsible Persons
- Ensure adequate organisational resources
- Receive compliance reports

- Provide assurance to the Board

#### **4.4. Responsible Persons (Directors)**

Responsible Persons are accountable for implementing this Policy within their areas of control and will ensure:

- Suitable and sufficient risk assessments are in place
- Control measures are implemented and maintained
- Remedial works are completed within agreed timescales
- Monitoring regimes are effective
- Compliance data is reviewed and escalated where necessary

#### **4.5. Water Safety Group (WSG)**

The Water Safety Group provides operational governance oversight and will:

- Meet quarterly as a minimum
- Review compliance performance and KPIs
- Monitor high-risk buildings and trends
- Review overdue remedial actions
- Escalate systemic risks to Senior Management
- Oversee emergency response arrangements

#### **4.6. Legionella Coordinator**

The Legionella Coordinator is responsible for day-to-day compliance management including:

- Coordinating risk assessments
- Managing specialist contractors
- Monitoring compliance data
- Reporting to the Water Safety Group
- Maintaining statutory records

#### **4.7. Building Responsible Persons (BRPs)**

BRPs are responsible for ensuring local control measures are undertaken, monitoring is completed, records are maintained and issues are escalated.

#### **4.8. Designated Persons**

Designated Persons undertake routine operational tasks including temperature monitoring, flushing and reporting anomalies.

#### **4.9. Risk Management Framework**

ACHA adopts a proportionate, risk-based approach.

#### **4.10. Risk Assessment Intervals**

- 100% High Risk buildings – maximum 2 years
- 100% Offices – maximum 2 years
- 100% Amenity housing – maximum 3 years
- General Needs housing – 10% annual stratified sampling model

#### **4.11. Rationale for 10% Sampling Model**

The 10% sampling model reflects domestic system simplicity, lower vulnerability profile compared to sheltered housing and a proportionate application of ACoP L8. The model is reviewed annually by the Water Safety Group and adjusted where required.

#### **4.12. Control Measures**

ACHA controls Legionella risk through:

- Temperature control ( $\geq 60^{\circ}\text{C}$  storage,  $\geq 50^{\circ}\text{C}$  outlets,  $< 20^{\circ}\text{C}$  cold)
- Prevention of stagnation
- Inspection and cleaning of storage tanks
- Monitoring and record keeping
- Risk-based sampling
- Secondary disinfection where required
- Capital intervention where system design contributes to risk

### **5. Performance Monitoring**

ACHA operates a three-tier assurance model aligned to the governance structure.

#### **5.1. Operational Assurance**

Delivered by the Legionella Coordinator and BRPs.

#### **5.2. Management Oversight**

Quarterly review by the Water Safety Group.

#### **5.3. Strategic Assurance**

Annual independent audit and Board reporting.

#### **5.4. Key Performance Indicators**

- 100% High Risk buildings with current risk assessment
- $\geq 98\%$  monitoring compliance
- 0 overdue high-priority remedial actions
- 100% annual tank cleaning completion
- 100% training compliance

## 5.5. Emergency & Incident Management

In the event of suspected or confirmed Legionellosis:

- Immediate escalation to Responsible Person
- Notification of relevant authorities where required
- Urgent sampling and system review
- Implementation of corrective measures
- Formal investigation and reporting to the Board where appropriate

## 6. Staff Development

ACHA will ensure Responsible Persons, BRPs and Designated Persons receive role-appropriate training. Competency records will be maintained and reviewed annually.

## 7. Policy Owner

This policy is owned by the Director of Assets.

## 8. Review

This Policy will be reviewed every three years or sooner in response to legislative change, regulatory requirement, significant incident or organisational restructure.

## 9. Complaints

We value complaints and endeavour to use information from them to help us improve our services. Complaints can be made if we fail to apply this policy properly or do not meet our organisational standards. Complaints are dealt with in line with our complaint handling procedure, a copy of which is available from our website, via the following link – <https://www.acha.co.uk/services-complaint-suggestion/> or alternative a copy can be made available on request.

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|-----------------------------------------------------------|-------------------------|------------|
| <b>Reference – PS_15</b>                                  |                         |            |
| <b>Policy Name – Legionella &amp; Water Safety Policy</b> |                         |            |
| <b>Approving body -</b> Board of Management               | <b>Next Review Date</b> | 28/05/2029 |
| <b>Date Equality Impact Assessment completed</b>          | 19/05/2026              |            |