



Water & Legionella Policy

Approved by:	Leadership Management Team
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Next review due:	November 2028
Policy developed by:	Operations Team

1. Introduction

- 1.1 Legionella bacteria can cause Legionnaires' disease, which is a group of pneumonia-like illnesses which can prove potentially fatal to those at higher risk including people with diabetes, chronic respiratory, or whose immune system is impaired.
- 1.2 For Legionnaire's disease to develop, the Legionella bacteria (specifically Legionella pneumophila) is water borne and is usually transferred by inhalation of water droplets. Under normal conditions, the disease cannot be passed from one person to another.
- 1.3 Hornsey Housing Trust (HHT) acknowledges the health hazards associated with exposure to legionella bacteria and will minimise risk through the use of control measures and safe management as detailed in the Approved Code of Practice (ACOP) L8.
- 1.4 The policy will inform and should be read in conjunction with the Legionella Management Procedure (Appendix 1).

2. Objectives

- 2.1 The purpose of the policy is to determine how Hornsey Housing Trust will manage Legionella bacteria to reduce the risk of potential exposure as part of its duties under the Health & Safety at Work Act 1974.
- 2.2 This policy applies to all operations, employees and contractors of Hornsey Housing Trust. It is designed to ensure that health and safety considerations are taken into account with water safety management and covers how water associated risks are managed to all properties owned (or managed under agreement) by HHT.
- 2.3 The basis for water safety is the assessment of water systems, their regular checking and accurate record-keeping to provide assurance that this has been done and a process to ensure any findings and deficiencies are adequately addressed.

3. Legislation

- 3.1 The policy conforms to the main legislation and guidance which apply to the Control of Legionella bacteria:
 - Health & Safety at Work Act 1974
 - Management of Health & safety Regulations 1999
 - Control of Substances Hazardous to Health Regulations (COSHH 2002)
 - Health and Safety Executive Approved Code of Practice (ACOP), Legionnaires' disease - The control of legionella bacteria in water systems, L8 (4th Edition)
 - HSG 274 Legionnaire's disease, technical guidance (Parts 1, 2 & 3)
 - BS8580-2:2022: - Water Quality Risk Assessments for Legionella Control
 - HSE INDG458 – Legionnaires' Disease: A brief guide for duty holders (2012)
 - Building Safety Act 2022
- 3.2 If there were to be an outbreak of legionella, HHT would need to demonstrate that it had followed the relevant provisions of the ACOP, or that it had complied with the law in some other way. The ACOP is intended to offer practical advice on how to comply with the law – the guidance is not compulsory but it does illustrate good practice in seeking to secure compliance with the law.

- 3.3 In the event of an incident where an employee or resident is diagnosed with Legionellosis and there is reasonable evidence of exposure within HHT's managed premises, a RIDDOR notification will be submitted to the Health and Safety Executive

4. Duty Holders and nominated responsible persons

- 4.1 The Board must appoint a Duty Holder with overall responsibility for water safety under Legionnaires' disease - The control of legionella bacteria in water systems, Approved Code of Practice and Guidance L8 (4th Edition). The duty holder must ensure that the person who carries out the risk assessment and provides advice on prevention and control of exposure must be competent to do so.
- 4.2 The Duty Holder will be responsible for ensuring that the relevant systems are tested and maintained according to legal requirements in particular to Approved Code of Practice, Legionnaires' disease - The control of legionella bacteria in water systems, L8 (4th Edition).
- 4.3 Hornsey Housing Trust's Duty Holder is the Repairs & Compliance Manager.
- 4.4 The Chief Executive has overall duty to ensure the organisation has sufficient resources and systems in place to achieve and maintain statutory compliance.
- 4.5 The Repairs & Compliance Manager is responsible for delivery of legionella management plan and maintaining a Water Management register and associated compliance with the ACOP.
- 4.6 HHT will employ a suitably qualified Water Management contractor to undertake the required competent person responsibilities.
- 4.7 Contractors shall:
- Attend sites, carry out Water Risk Assessments, tank inspections, cleaning and chlorination, shower head replacement and monthly test. Advises and carries out any follow-on works.
 - Immediately notifies HHT if water quality is affected. Arrange for remedial action ASAP.
 - Provide risk assessments and certification in line with regulation.

5. Approach

- 5.1 The approach of HHT and its contractors include:
- Having a named person who takes responsibility for water safety in each part of the organisation (including contractors) to which the legal requirements apply;
 - Identifying and listing all relevant water systems and that the list is kept up to date (there is currently only one in Hornsey Housing Trust);
 - Undertaking or risk assessments of all relevant systems by a competent contractor;
 - Undertaking risk assessments in individual non-block dwellings on a sample (10%) of properties, based on the property type and typical systems contained therein;
 - Having an agreement (or Scheme of Control) that specifies the control actions necessary to prevent proliferation of legionella bacteria, and how these actions are to be divided between the water hygiene contractor and HHT;

- Any dead legs should be identified and removed.
- Recording risk assessments and any actions taken as part of the Scheme of Control. If they are held by the contractor, HHT has unrestricted access to the records, including in the situation where there is a change in contractor

6. Risk Assessments

- 6.1 In accordance with the COSHH Regulations 2002 and good practice set out in the HSE ACOP HHT has a duty to take reasonable steps to safeguard people from hazards associated with water supplies, particularly water borne bacteria.
- 6.2 HHT will comply with the above duties by undertaking an initial risk assessment to identify the risk level of each property. This will identify whether the possibility exists of conditions suitable and liable to facilitate the growth of legionella bacteria. This in turn will determine where a site-based risk assessment is required.
- 6.3 The site-specific risk assessments will include:
- Details of the water systems including up to date plans or schematics
 - Details of the safe and correct operation of the relevant systems
 - Details of what control methods and precautionary methods are to be taken and by whom
 - Details of the frequency and type of checks that are required and who will undertake these.
- 6.4 Risk Assessments will be reviewed every two years or sooner if specific changes have taken place to the water management services.

7. Policy Review

- 7.1 This policy will be reviewed every three years or earlier should there be any change in legislation or best practice.

Appendix 1

Legionella Management Procedure

1. Introduction

- 1.1 This document sets out procedures to control, manage and minimise the risk of legionella bacteria in water systems within the premises owned or managed by HHT.

2. Legionella Management duties

- 2.1 The Repairs & Compliance Manager duties and responsibilities include:
- To maintain live risk assessments for all applicable asset
 - To maintain a Water Management asset database
 - To ensure competent contractors are employed and staff trained to deliver the legionella management procedure
 - To ensure that the 'duty of care' to our tenants, employees and contractors is robust
 - To carry out monthly checks
 - To update site log books with information gathered in monthly checks
 - To bring to the attention of the Head of Property any anomalies with regards water temperatures during checks

3. Risk assessment results / remedial works

- 3.1 The completed risk assessments will make recommendations as to remedial works required to the domestic water system in order to comply with the Approved Code of Practice.
- 3.2 These recommendations will be prioritised as high, medium and low with associated time scales as to when the work should be completed.

4. Site log book / record keeping

- 4.1 A site log book will be maintained on site incorporating the following:
- Full site address
 - Risk Assessment
 - Schematic drawing of water storage tanks and associated pipework
 - Monthly checks

5. Monitoring timescales

- 5.1 The periodic checks to be undertaken include the following measures and timescales:

Service	Task	Frequency	Responsibility
Hot Water Service	Check temperatures in flow and return at calorifier	Monthly	Water Management contractor
Cold Water Service	Visually inspect cold water storage tanks and carry out remedial work where necessary.	Annually	Water Management contractor
	Check representative taps for temperature below 20c on a rotational basis.	Annually	Water Management contractor
	Check water temperature is below 20c after running taps for up to one minute in the sentinel taps	Monthly	Water Management contractor
Shower Heads	Dismantle, clean and de-scale shower heads and hoses (schemes only)	Annually	Water Management contractor
Little used outlets	Flush through and purge and maintain records	Prior to use in respect of guest rooms	Housing Manager
Void properties	Run void tap outlets As part of void process		Day to day contractor

N.B. No hose reels to be used in respect of outside taps.

6. Void properties

6.1 In void properties HHT will:

Short term voids

- Ensure water outlets are run weekly and recorded
- Remove the shower head and disinfect or replace

Long term voids

- Flush the system through completely prior to the new tenants moving into the
- Property.

7. Training

7.1 The appointed person who is involved in managing water safety of (or behalf of) HHT will receive training to ensure that they have an understanding of HHT's responsibilities.

7.2 HHT will ensure suitable and sufficient training of staff to support them with their responsibilities in water hygiene.

- 7.3 Refresher training shall be undertaken every three years or sooner if roles or systems change

8. Auditing and review

- 8.1 To ensure that live risk assessments are being maintained the 'responsible person' shall carry out continuing auditing of all log books on sites and the monitoring of all risk assessment actions to determine the extent to which the processes and procedures are adequate and being appropriately applied. The arrangements for undertaking this monitoring are to be documented as part of the management system for water safety.

- 8.2 HHT's Key Performance Indicator (KPI) for water safety is:

- Premises requiring a water safety risk assessment (i.e. within periodicity identified in original assessment) versus premises requiring a water safety risk assessment that are overdue. To be reported monthly to the Leadership Management Team and quarterly to the Board.
- The rolling target for compliance with periodic checks is 100%.