

## LEGIONELLA POLICY

Date Reviewed	June 2026	Next Review Date	June 2029
Consultation	Safety Panel	Reviewed by	Assistant Director Governance & Risk
EIA		Responsible Officer	Director of Customer Services
DPIA		Approval by	Executive Team

### 1. PURPOSE

This policy sets out how Black Country Housing Group (BCHG) will manage the risks associated with Legionella bacteria and water systems across its housing stock and related assets.

BCHG is committed to ensuring that all water systems are managed safely and in compliance with relevant legislation and guidance, protecting employees, residents, contractors, and others who may be affected.

### 2. SCOPE

This policy applies to:

- All properties owned, managed, or maintained by BCHG, including domestic and non-domestic premises
- All water systems within those properties, including hot and cold water systems and associated equipment
- All employees, contractors, and third parties involved in the management, maintenance, or monitoring of water systems
- All activities that may impact the control of Legionella risks

### 3. LEGAL AND REGULATORY FRAMEWORK

BCHG will comply with all relevant legislation, regulation, and guidance relating to the control of Legionella, including:

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Control of Substances Hazardous to Health Regulations 2002 (COSHH)
- Approved Code of Practice (ACOP) L8 – The Control of Legionella Bacteria in Water Systems
- HSG274 – The control of Legionella bacteria in water systems (Parts 1–3)
- Relevant British Standards and Health and Safety Executive (HSE) guidance

BCHG will also have regard to regulatory expectations, including the requirement to provide safe homes and services.

### 4. BCHG COMMITMENTS

BCHG will take a proactive and risk-based approach to managing Legionella risks. In doing so, BCHG will:

#### 4.1 Identification and Risk Assessment

- Identify and assess potential sources of Legionella risk across all relevant properties

- Ensure risk assessments are suitable, sufficient, and reviewed periodically or when circumstances change

#### 4.2 Management and Control of Water Systems

- Implement and maintain appropriate control measures to prevent or minimise the risk of Legionella growth
- Maintain water systems in a safe condition, including appropriate temperature control and prevention of stagnation

#### 4.3 Monitoring, Inspection and Maintenance

- Ensure monitoring, inspection, and maintenance activities are carried out in accordance with legal requirements, recognised guidance, and BCHG's written scheme of control
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- Maintain accurate records of monitoring, inspections, and remedial actions

#### 4.4 Safe Delivery of Works

- Ensure that any works affecting water systems are properly planned and carried out by competent persons
- Ensure that appropriate controls are in place to prevent exposure during works

#### 4.5 Information and Resident Safety

- Provide clear and accessible information to residents regarding water safety and Legionella risks where relevant
- Take account of the needs of vulnerable residents when managing risks

#### 4.6 Training and Competence

- Ensure that employees and contractors receive appropriate training and instruction relevant to their roles
- Maintain oversight of competency requirements for those responsible for managing Legionella risks
- Monitor and report on training completion, compliance, and competency assurance through appropriate governance routes

### 5. ROLES AND RESPONSIBILITIES

#### Group Audit Committee (GAC)

- Receive regular assurance on Legionella compliance, performance, and risk
- Seek assurance that controls are operating effectively in line with the written scheme of control
- Provide scrutiny and challenge in line with its Terms of Reference and delegated responsibilities

#### Board and Executive Team

- Provide oversight and assurance that Legionella risks are effectively managed
- Receive regular reports on compliance and performance

#### Responsible Director (Director of Customer Services)

- Ensure that appropriate systems, resources, and controls are in place to manage Legionella risks
- Ensure compliance with legal and regulatory requirements

#### Operational Management

- Ensure delivery of inspection, maintenance, and compliance programmes
- Monitor contractor performance and ensure compliance with the written scheme of control

#### Competent Person

- Provide technical oversight of Legionella risk management
- Ensure risk assessments remain valid and that appropriate actions are taken

#### Employees and Contractors

- Comply with Legionella control measures
- Report any concerns, faults, or risks promptly

### **6. ASSURANCE, MONITORING AND REPORTING**

BCHG will maintain a robust framework for monitoring and providing assurance on Legionella compliance. This will include:

- Maintaining accurate and up-to-date records
- Monitoring completion of risk assessments, inspections, and control measures
- Reviewing incidents, risks, and performance data
- Reporting compliance performance to senior management and the Board
- Monitoring and reporting on training compliance and competency levels

Where risks or non-compliance are identified, prompt and appropriate action will be taken to mitigate risk and protect residents and others.

### **7. EQUALITY, DIVERSITY & INCLUSION**

BCHG will ensure that this policy is applied fairly and consistently and that no individual or group is disadvantaged.

Particular consideration will be given to residents who may be more vulnerable due to age, disability, or health conditions, ensuring appropriate support and communication is provided.

### **8. DATA PROTECTION**

BCHG will ensure that any personal data processed as part of Legionella management activities is handled in accordance with UK GDPR and the Data Protection Act 2018.

Data processing will be limited to what is necessary to manage risks, ensure safety, and meet legal obligations, with appropriate safeguards in place.

### **9. REVIEW**

This policy will be reviewed at least every three years, or sooner where there are changes in legislation, regulation, guidance, or organisational requirements.

## APPENDIX 1

### Water Hygiene (Legionella) Written Scheme of Control

<b>Premises:</b>	
<b>Dutyholder:</b>	Board
<b>Competent Person:</b>	Environmental, Investment & Compliance Manager
<b>Responsible Persons and Deputies:</b>	Defined below and within operational arrangements

#### 1. Overview

This Written Scheme of Control sets out the operational arrangements for managing Legionella risks in buildings with complex water systems.

***It should be read in conjunction with the Legionella Risk Assessment for the premises.***

The scheme ensures that:

- Control measures are in place to prevent or minimise risk
- Monitoring and maintenance activities are carried out
- Responsibilities are clearly defined
- Records are maintained to demonstrate compliance

#### 2. Control Activities and Responsibilities

Task	Primary Responsible	Deputy	Frequency
Arrange Legionella risk assessments and track remedial actions	Environmental, Investment & Compliance Manager	Head of Property	As required
Risk assessment validation and review	Environmental, Investment & Compliance Manager	Head of Property	Every 2 years or as required
Complete and review schematics and system records	Contractor	Contractor	As required
Identify hazards during inspections and routine activities	Scheme Manager / Contractor / Asset Management	N/A	Ongoing
Respond to temperature failures or system faults	Commercial Gas Contractor	Commercial Gas Contractor	As required
Monthly water temperature testing	Contractor	Contractor	Monthly
Review monitoring results and action findings	Compliance Officer	Environmental, Investment & Compliance Manager	Monthly
Communal cleaning and limescale control	Scheme Manager	Independent Living Manager	Weekly
Flushing infrequently used outlets (communal)	Scheme Manager	Independent Living Manager	Weekly

Cleaning / replacing showerheads and hoses	Contractor	Contractor	Quarterly
Cleaning outlets within tenanted flats	Occupant	Occupant	Weekly
Flushing outlets within tenanted flats	Occupant	Occupant	Weekly
Showerhead descaling (flats)	Occupant	Occupant	Quarterly
Manage aerators / tap fittings	Scheme Manager	N/A	Quarterly
Communicate tenancy obligations	Scheme Manager	Scheme Manager	As required
Arrange TMV servicing and testing	Environmental, Investment & Compliance Manager	Compliance Officer	Annually
Ensure staff training and competence	HR / Line Managers	N/A	As required
Ensure compliant materials (e.g. WRAS-approved)	Head of Assets & Investments	Head of Property	As required
Respond to Legionella incidents / suspected cases	Environmental, Investment & Compliance Manager	Head of Property	As required
Ensure safe working practices	All staff	All staff	Ongoing
Arrange tank and cylinder inspections	Environmental, Investment & Compliance Manager	Assets & Building Safety Manager	Annually
Arrange tank and cylinder cleaning	Environmental, Investment & Compliance Manager	Assets & Building Safety Manager	As required
Pressure vessel inspections (boiler systems)	Contractor	Contractor	Six-monthly

### 3. Key Control Measures

The following core controls apply across all relevant properties:

- Maintenance of hot water at appropriate temperatures
- Maintenance of cold water below risk thresholds where reasonably practicable
- Prevention of water stagnation through regular flushing
- Removal or control of scale, sludge, and contaminants
- Use of thermostatic mixing valves (TMVs) where required
- Monitoring and testing of water systems
- Prompt response to out-of-specification results

### 4. Monitoring Regime (Typical)

Weekly:

- Flushing of infrequently used outlets

Monthly:

- Temperature checks at sentinel outlets
- System monitoring and recording

Quarterly:

- Showerhead cleaning and/or replacement

Annually:

- TMV servicing
- Tank inspections (where applicable)

Periodic:

- Risk assessment review (minimum every 2 years or triggered by change)

## 5. Escalation and Incident Response

Where concerns or failures are identified:

- Log issue as an incident or near miss
- Report immediately to the Responsible Person
- Escalate to the Environmental, Investment & Compliance Manager
- Engage relevant contractors to investigate and resolve
- Record actions and outcomes
- Notify Dutyholder where appropriate
- Implement business continuity arrangements if required

## APPENDIX 2

### Tenant Advice – Legionella and Water Safety

#### What is Legionella?

Legionella bacteria are commonly found in natural water sources such as rivers and lakes. They can also occur in man-made water systems, including domestic water systems in homes.

People can become infected by inhaling small water droplets (aerosols) containing the bacteria.

The overall risk in most homes is low, but simple steps can reduce it further.

#### How to Reduce the Risk

Residents can help manage water safety by:

##### *General Use*

- Run all taps and showers regularly (at least once a week if not routinely used)
- Ensure hot water reaches temperature (should feel hot within one minute)

##### *After Periods Away*

If a property has been unoccupied for more than one week:

- Run all taps and outlets for several minutes
- Flush toilets
- Run showers before use

##### *Showers*

- Clean and descale showerheads every 3 months
- If unused for two weeks or more:
  - Remove the showerhead (if possible)
  - Run the shower for at least 2 minutes before use

##### *Outdoor Equipment*

- Flush hosepipes before use
- Avoid creating spray when flushing
- Clean nozzles periodically

##### *Reporting Issues*

Residents should contact BCHG if they notice:

- Water not heating correctly
- Unusual water discolouration or odour
- Long periods of low usage or stagnation
- Any concerns about water safety

Repairs Team: 0300 555 0302

Email: [compliance@bchg.co.uk](mailto:compliance@bchg.co.uk)

#### Further Information

Further guidance is available from the Health and Safety Executive:

<https://www.hse.gov.uk/legionnaires/>