

# Risk Assessment: Legionella Policy

## Context

This risk assessment examines the effectiveness and adequacy of the Council's legionella policy, focusing on risk identification, mitigation, and compliance with relevant legislation.

## Understanding Legionella Risks

Legionella thrives in water systems, particularly where water is stored or recirculated, such as hot and cold water tanks, showers, taps, and communal facilities. Vulnerable populations, including older people or immunocompromised residents, are at increased risk. The Council is responsible for ensuring water systems do not harbour conditions conducive to legionella growth.

## Key Legislative and Regulatory Requirements

- Health and Safety at Work Act 1974: Requires employers and landlords to ensure the health and safety of their employees and tenants.
- Control of Substances Hazardous to Health (COSHH) 2002: Covers biological agents such as legionella.
- Approved Code of Practice L8 (ACOP L8): Provides guidelines for the control of legionella bacteria in water systems.

Failure to comply can result in legal action, reputational damage, and increased risk to health.

## Policy Review and Risk Assessment Steps

1. Identification of Water Systems
2. Survey all housing stock to identify water storage, distribution systems, and communal facilities.
3. Document system age, maintenance history, and susceptibility to stagnation or temperature fluctuations.
4. Assessment of Resident Risk
5. Identify vulnerable groups within the association such as older people and people with disabilities
6. Evaluate exposure risk based on resident activities and facilities used.
7. Check frequency and adequacy of water temperature monitoring (hot water >60°C, cold water <20°C).
8. Assess routine cleaning, descaling, and disinfection procedures.

9. Verify maintenance schedules for water tanks, calorifiers, and showers.
10. Ensure staff responsible for water system maintenance are adequately trained.
11. Regular refresher courses and clear documentation of responsibilities.
12. Policy Communication and Resident Awareness
13. Inform residents about legionella risks and prevention measures.
14. Provide guidance for resident-owned appliances such as showers and taps
15. Establish clear procedures for reporting suspected legionella cases.

## Risk Evaluation

<b>Risk Factor</b>	<b>Likelihood</b>	<b>Impact</b>	<b>Risk Level</b>	<b>Control Measures</b>
Stagnant Water	Medium	High	Significant	Regular flushing of outlets, removal of dead legs, system design review
Poor Temperature Control	Medium	High	Significant	Routine temperature checks, thermostatic mixing valves
Inadequate Maintenance	Low-Medium	High	Moderate	Scheduled inspections, competent contractors
Resident Awareness	Low	Medium	Moderate	Information leaflets, noticeboards, induction packs

## Mitigation Measures

- Conduct annual risk assessments for all properties and update the policy accordingly.
- Maintain comprehensive records of water system maintenance and monitoring.
- Enhance staff training and ensure clarity in roles and responsibilities.
- Increase resident engagement through awareness campaigns.
- Regularly review and audit control measures for effectiveness.