



# Legionella and Water Hygiene Management Procedure

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## Version Control

Date	Owner	Version	Reason for Change
Oct 2019	Jackie O'Neill	1	New format
			Completion of staff training

# Legionella and Water Hygiene Management Procedure

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## 1.0 Introduction

Legionnaires' disease is a potentially fatal pneumonia caused by legionella bacteria. It is the most well-known and serious form of a group of diseases known as legionellosis. Other similar but usually less serious conditions include Pontiac fever and Lochgoilhead fever. Infection is caused by breathing in small droplets of water contaminated by the bacteria. The disease cannot be passed from one person to another. Everyone is potentially susceptible to infection but some people are at higher risk e.g. those over 45 years of age, smokers and heavy drinkers, those suffering from respiratory or kidney disease and people whose immune system is impaired.

Legionella bacteria are common in natural water courses such as rivers and ponds. Since legionella bacteria are widespread in the environment, they may contaminate, proliferate and grow in other water systems such as cooling towers and hot and cold water services. The bacteria thrive at temperatures between 20°C and 45° C if the conditions are right, e.g. if a supply of nutrients is present such as rust, scale, algae, sediment and other bacteria. Legionella bacteria are killed by high temperatures.

If water droplets are created and dispersed into the atmosphere, then people in the vicinity may be at risk of inhaling the bacteria. To eliminate or reduce the risk, control measures must be in place to prevent the proliferation of the organism in water systems and to minimise the generation of water droplets and aerosols.

## 2.0 Arrangements

### 2.1 Legal Requirements

The specific requirements for the control of legionella bacteria in the workplace are provided in "The Prevention or Control of Legionellosis, Approved Code of Practice L8 (Fourth Edition)," (ISBN 978 0 7176 6615 7), published by the Health & Safety Executive.

The principal requirements include:

- Identifying and assessing sources of risk;
- Preparing a scheme (course of action) for preventing or controlling the risk;
- Implementing and managing the scheme – appointing a person to be managerially responsible, often referred to as the `responsible person`;
- Maintaining records and checking that what is being done is effective;
- Providing training for persons with delegated responsibilities.

Compliance with L8 ensures compliance with duties under the Health and Safety at Work Act 1974 and the Control of Substances Hazardous to Health Regulations (COSHH) 2002.

L8 (Fourth Edition) has been approved by the Health and Safety Commission, with the consent of the Secretary of State. It gives practical advice on how to comply with the law. If the advice is followed, ARK will be complying with the law in respect of those specific matters on which the Code gives advice. ARK may use alternative methods to those set out in the Code in order to comply with the law. However, the Code has a special legal status. If ARK is prosecuted for breach of health and safety law and it is proved that it did not follow the relevant

provisions of the Code, ARK will need to show that it has complied with the law in some other way or a Court will find you at fault.

The L8 document also contains guidance issued by the Health and Safety Commission and Executive. Following the guidance is not compulsory and ARK is free to take other action. But, if ARK does follow the guidance it will normally be doing enough to comply with the law. Health and Safety inspectors seek to ensure compliance with the law and may refer to this guidance as illustrating good practice.

L8 applies to:

- Hot and cold water systems;
- Plant or systems containing water likely to exceed 20°C, which may release aerosols during routine operation or maintenance;
- Cooling towers;
- Evaporative condensers.

This Policy Statement sets out the arrangements for controlling legionella in ARK's water systems, plant and specialist equipment, in accordance with ACOP L8.

## 2.2 Principal Objectives of the Procedure

The principal objectives of the legionella and water hygiene policy are:

- To safeguard anyone who may be affected by legionella or similar bacteria within or close to any ARK premises;
- To ensure an effective management system is in place;
- To prevent possible cross contamination between mechanical plant, user equipment and hot and cold water and wholesome water supplies within ARK premises.

## 2.3 Duty Holders and Responsibilities

The control and management of legionella in hot and cold water systems is a corporate responsibility and the role of the Statutory Duty Holder rests with ARK's Chief Executive. L8 allows the Duty Holder to obtain assistance from a competent service provider and ARK has engaged a specialist water hygiene contractor in this regard.

## 2.4 Division of Responsibilities

ARK is responsible for the safety of the supply of hot and cold water to the outlets, i.e. taps, showers etc. and isolation points for water using equipment.

Individual site managers ROM / CSM are responsible for ensuring the safe use of these water supplies within the areas under their control and, as stakeholders, in the prevention of legionella proliferation and cross contamination of water systems.

## 2.5 ARK Housing Property Management / Care and Support Structure

The Property Management and care and support staff have, between them, responsibility for the design, installation and ongoing management and maintenance of the hot and cold water systems within all ARK properties, as indicated in the Communication Pathway section.

The Property Management and care and support staff will appoint a Responsible Person (RP) and deputy Responsible Person(s) as appropriate. The RP / deputy RPs are charged with implementing a written scheme to control legionella within domestic hot and cold water systems within ARK properties. The RP / deputy RP will monitor and review the effectiveness of the scheme.

The main duties of the RP / Deputy RP are to: -

- Identify and assess source of risk; e.g. legionella, cross contamination;
- Review risk assessments in areas where significant changes occur with a full review every two years;
- Review risk assessments and action any recommendations highlighted within;
- Prepare a scheme or course of action for preventing or controlling the risk;
- Implement and manage the scheme;
- Keep records and check that what has been done is effective;
- Liaise with properties RP's to provide assistance and guidance;
- Identify training for persons with delegated responsibilities.

## 2.6 Legionella Risk Assessment

The appointed external contractor will take the lead role in carrying out legionella risk assessments for all hot and cold water building services distribution systems within all ARK properties and organise risk assessments for departmental water using equipment connected to the building domestic hot and cold water distribution systems.

## 2.7 Design, monitoring and maintenance of hot and cold water systems

The Property Management/ Care & Support staff are responsible for:

- Ensuring that the design of hot and cold water systems within buildings complies with all relevant legislation;
- Ensuring that employed Contractors and in-house staff comply with the written scheme / all aspects of ACoP's L8;
- Monitoring the temperature of hot and cold water supplies throughout ARK Housing properties for which it has direct responsibility and carrying out remedial works if where necessary.

- Ensuring the ongoing maintenance of all ARK Housing hot and cold water systems that form part of the building services infrastructure;
- Facilitating appropriate safety training courses for all those with responsibilities for compliance with this policy;
- Endeavouring to ensure full compliance with all aspects of ACoP's L8.

### 3.0 ARK Properties

All ARK properties have duties under this procedure. Each local manager is responsible for the ongoing management of use of departmental water-using equipment and general domestic hot and cold water building distribution systems within the areas that come under their control.

Such systems may include but are not limited to wash hand basins, showers, sinks, humidifiers, autoclaves, catering equipment, pot wash spray flexible hoses, lathes, power wash spray lances, irrigation systems, hose pipes, greenhouse misters – in summary management of all outlets and departmental water using equipment that is connected to the building domestic hot and cold water distribution systems.

#### 3.1 Properties which are not supported (outwith Section 2.7)

ARK have a number of properties within its stock portfolio which would normally be occupied by, and termed as mainstream tenants, therefore the water systems within these properties would not present the same level of risk, as they would to vulnerable supported tenants and service users.

To minimise the possibility of infection, prior to any new tenant moving in to that property ARK shall replace shower heads (where appropriate) and flush these domestic water systems as part of our pre and post void works in each property, prior to the start of any new tenancy.

In addition a representative sample of all similar properties (5% approx.) will be randomly selected each year for a full legionella assessment to ensure the Association is fully compliant with the current legislation. This arrangement also applies to offices.

#### 3.2 Site Responsible Person (SRP)

Each property must appoint a Site Responsible Person / ROM / CSM. The properties SRP will be responsible for water hygiene associated with general use of domestic hot and cold water systems and water using equipment or systems (departmental equipment / operations / standard operating procedures). It may also be necessary to appoint deputy SRPs for each sub-division or functional unit. It is the responsibility of the Chief Executive to make such appointments as appropriate. If a particular risk is identified then the SRP should ensure that suitable actions are taken to remove the risk or implement effective measures to control the risk. The names of all properties SRPs and deputy SRPs should be provided to the Property Management/ Care & Support staff.

Each properties SRP will carry out, or where relevant ensure that deputy SRP`s carry out the following:

- Identify infrequently used outlets;
- Organise and carry out flushing of infrequently used outlets and maintain records;
- Identify and schedule all departmental water using equipment;
- Seek competent advice;
- Liaise with the SRP or deputy SRP;
- Attend organised training for persons with delegated responsibilities;
- Attend regular water hygiene meetings organised by the Property Management and care and support staff.
- Arrange training for new C & S staff

### 3.3 Specialist departmental systems or equipment

Where departments possess and operate specialist water systems or equipment that are completely independent of the domestic hot and cold water building distribution supplies i.e. not connected to the building services infrastructure. These may still require water supplies and, therefore, may still present a potential legionella exposure risk. Therefore, the department must take on the responsibilities of the Duty Holder. In such cases, the property should contact the Health & Safety team for guidance.

### 3.4 Risk Assessment

All properties are responsible for notifying the Property Management and care and support staff of any / all water using equipment, systems or activities directly under their control. All departmental equipment permanently connected to the domestic hot and cold and wholesome water (mains cold water) supplies must be identified and risk assessed.

The RP will arrange for such risk assessments to be carried out. The RP will discuss the results of the risk assessment and any remedial actions / control measures requiring to be implemented with the properties RP. Specialist advice is available and departments requiring assistance in fulfilling their duties should contact the Property Management and/or care and support staff.

### 3.5 Emergency Procedures

If during routine monitoring and maintenance of hot and cold water systems and related equipment, legionella bacteria of a concentration level likely to be hazardous to health is discovered then any systems likely to provide a medium for the spread of infection (e.g. water aerosol spraying equipment) must be immediately shut down.



## 4.0 Control of Legionella

The broad requirements of L8 for controlling legionella bacteria in water systems are:

- Appointment of a responsible person (in a managerial rather than technical grade);
- Formal legionella risk assessment with suitable and sufficient documentation of findings, including schematic drawings detailing the water system;
- Ongoing review and reassessment of legionella exposure risk;
- Development of a risk minimisation programme, a prioritised action plan and a mechanism for escalating remedial work where risk assessment and monitoring data indicate a risk;
- Implementation and management of the programme;
- Use of WRAS approved products within the water supplies and fittings;
- Development of formal procedures for inspection, maintenance and disinfection of water systems;
- Training of staff;
- Maintaining suitable records.

Risk assessments should be reviewed as and when they may no longer be valid. For example when significant changes are made to the use of the building or significant changes are made to the water services infrastructure within the building.

ARK is responsible for the maintenance, monitoring, treatment, cleaning and disinfection of hot and cold water systems per the guidance set out in L8 and the risk assessment for each system should detail these arrangements.

Where risk assessment identifies a significant risk, the Property Management and care and support staff will arrange for the system to be disinfected immediately by thermal or chemical means. The system will then be monitored to ensure the efficacy of the treatment regime. If necessary, the regime will be modified until the risk of exposure to legionella is reduced to acceptable limits.

## 5.0 Hot and Cold Water Services

Water services systems must comply with the Scottish Water Byelaws (2004), BS EN 806 parts 1 – 5, BS 8558 (2011) and any subsequent amendments to these documents.

The Property Management will endeavour to ensure that only competent contractors are engaged for maintenance, repair, or replacement programmes and that only approved materials are used.

The Property Management / Clearwater will ensure that cold water storage is minimised to avoid stagnation occurring with the storage tank(s), will ensure that suitable measures are in place to protect cold water storage tanks from heat gain and dust ingress and will endeavour to ensure that tank fed cold water distribution systems deliver cold water to the outlet at  $\leq 20^{\circ}\text{C}$ .

Storage calorifiers and recirculating hot water systems should store hot water at a minimum temperature of 60°C and deliver hot water of at least  $\geq 50^{\circ}\text{C}$  at sentinel and representative outlets. The appointed contractor is responsible for monitoring and recording these temperatures.

Where thermostatic mixing valves (TMVs) are installed, these must be sited as close as possible to the point of use. As a general rule TMVs should not serve multiple outlets.

All domestic hot and cold water outlets e.g. taps, showers, drip cups, trigger operated spray guns, hose pipes etc. must be used regularly; - at least on a weekly basis to prevent potential stagnation of the water supply. All properties must identify to the Health & Safety team any outlets that are used either intermittently or which are under-used and immediately report any faults or problems found with the domestic hot and cold water system. Outlets that are identified by the properties SRP as being under-used, are classified under ACoP's L8 as 'infrequently used outlets'. The properties SRP will ensure that all infrequently used outlets are being flushed to drain for at least five minutes, once a week and records of flushing kept on file.

Consideration should be given by the property department for permanent removal of the infrequently used outlet if considered appropriate.

Departmental managers must also notify the Property Management/ Care & Support staff of any significant change of use within their department that may adversely impact on the legionella control programme and therefore necessitate a re-risk assessment of the installation.

## 6.0 Other Equipment and Activities that create Risk

Equipment such as water softeners, sprinkler and hose reel systems, lathe or machine tool coolant systems, horticultural misting equipment, fume cupboard water supplies, automatic feeding systems, indoor fountains and water features can also create risk.

The Property Management/ Care & Support staff should provide adequate written information to users to enable safe use of the water system(s).

## 7.0 Cooling Towers and Evaporative condensers (including adiabatic systems)

There are no evaporative condensers in ARK Housing properties and none may be newly installed.

Adiabatic cooling systems are not permitted in ARK Housing properties.

## 8.0 Training and Competence

A specific training programme of seminars and courses is being put in place for ARK Housing management and staff. RPs, deputy RPs and C & S staff should attend, as well as those individuals who are managerially responsible for specialist departmental water using equipment. Details can be found on Appendix 6 of this document.

ACOP L8 covers the need for competence in paragraph 45 – Competence, stating:

“Those appointed to carry out the control measures and strategies should be suitably informed, instructed and trained and their suitability assessed. They should be properly trained to a standard which ensures that tasks are carried out in a safe, technically competent manner. Regular refresher training should be given and records of all initial and refresher training need to be maintained.

Although training is an essential element of competence, it is not the only factor – it should be viewed as a product of sufficient training, experience, knowledge and other personal qualities which are needed to undertake a job safely. Competence is dependent upon the needs of the situation and the natures of the risks involved”.

## 9.0 Summary of ARK Actions

All Departments must ensure that:

- Suitable regimes are in place for general maintenance, disinfection, cleaning and monitoring of specialised water systems / departmental equipment, and that records are kept.
- Ensure that personnel who operate and maintain specialised water systems / departmental equipment are suitably trained.
- The Property Management / Care & Support staff are notified and given the opportunity to comment and advise in advance of any intended alteration to the domestic water distribution system(s) prior to works being instructed or commencing.
- The Property Management / Care & Support staff are notified of any hot or cold water outlet which is under-used or used intermittently (infrequently used outlets) so that an appropriate management plan can be discussed and implemented by the property.
- All specialised water systems / departmental equipment connected to water supplies are risk assessed for legionella exposure.
- Ensure that drinking water chillers are regularly serviced and maintained by ARK Housings drinking water chiller service provider with records retained on file.
- The Property Management / Care & Support staff to minimise the risk of cross contamination of domestic hot and cold water and wholesome water supplies from water using departmental equipment / specialist equipment. Departments should seek advice and guidance from Property Management / Care & Support staff.

## 10.0 Equality Impact Assessment (EIA)

There are no negative Equality implications identified in relation to the revision of this procedure document, and consequently an EIA has not been completed.

## 11.0 Data Protection Impact Assessment (DPIA)

The potential data protection implications around the collection of personal data which have been identified in relation to the revision of this procedure have been addressed in the department's DPIA.

## 12.0 Implementation and Review

### 12.1 Implementation

This procedure applies to all Staff in ARK. The Head of Property Management is responsible for the procedure's day-to-day implementation.

ARK will ensure that all necessary staff receive appropriate training and guidance on this procedure.

Responsibility for monitoring the application of this procedure will rest with The Head of Property Management.

### 12.2 Review

The procedure will be reviewed regularly as necessary, and in any event not less than every three years.

## Appendix 1- Management Arrangements

### **Statutory duty holder**

Ultimately, the statutory duty holder has responsibility for full implementation of the Policy. The statutory duty holder is responsible for the following:

- appointing a responsible person to manage risk on a day-to-day basis
- ensuring that sufficient resources are provided for satisfactory control
- ensuring that the appointed responsible person and deputy are competent to fulfil their responsibilities.

**Please refer to responsibility index at the Appendix 4**

### **Appointed responsible person**

The appointed responsible person for the management of the water services has a primary role to act as administrator in the management control of water quality in accordance with the Approved Code of Practice (ACOP L8).

It is the responsibility of the appointed responsible person to:

- Ensure that only competent contractors who are fully aware of the duties and responsibilities assigned to them are used on site. A Legionella Control Association (LCA) Certificate can be used as an indication of company competence.
- Ensure that the records system is kept up to date and made site specific.
- Be fully aware of the status of the site's water systems, which represent a risk to the health of anyone who may come into contact with them.
- Coordinate corrective actions whenever an emergency action is needed.
- Review the management programme and change/improve any aspects that are highlighted by the review process.
- Ensure that the Water Hygiene Risk Assessment is up-to-date and available for inspection at all times. If, at any time, there is reason to believe the risk assessment is no longer valid then have the risk assessment reviewed at least every two years.
- Maintain awareness of developments in technology and legislation that may further reduce the risk of legionellosis.
- Liaise with the deputy responsible person and keep them up-to-date.
- Ensure the responsibilities of the appointed responsible person moves down the management structure to the deputy responsible person during periods of absence.

### **Deputy appointed responsible person**

The deputy appointed responsible person will also provide support to the appointed responsible person on a day-to-day basis. They will also assume full responsibility during any periods of the appointed responsible person's absence.

### **Water treatment specialists**

The contractor is responsible for the provision of water treatment throughout Ark properties included in the contract list of locations. This responsibility is subject to the agreement between the responsible person and the water treatment contractor. This contractor shall provide services as defined by the responsibility index at the end of the section – Page 11.

Training certificates and competency statements for site operatives regarding the control of water quality are to be filled in the relevant section of each site log book.

The water treatment specialists are also responsible for providing information regarding the chemicals they bring onto site for the treatment of the water services in the building.

Control of Substances Hazardous to Health (COSHH) safety data sheets and assessments should be displayed at the point-of-use and filed in the relevant section of this log book.

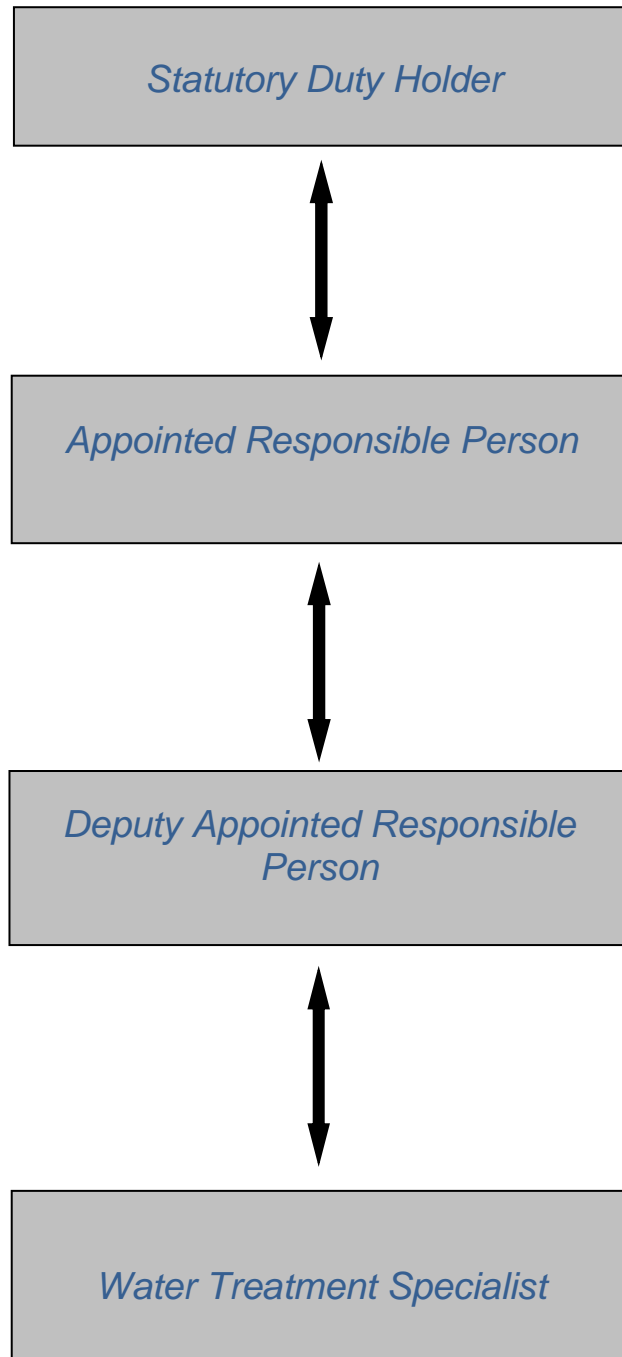
Typically, the water treatment contractor is responsible for ensuring that up-to-date procedures and risk assessments in accordance with the Management of Health and Safety at Work Regulations are available before undertaking works at the building. These should be filed in the relevant section of this log book.

All monitoring, inspection and test results produced on site by the water treatment specialist are to be recorded in the relevant section of this log book. All other certificates, documents and test results are to be provided to the client for inclusion in the relevant sections.

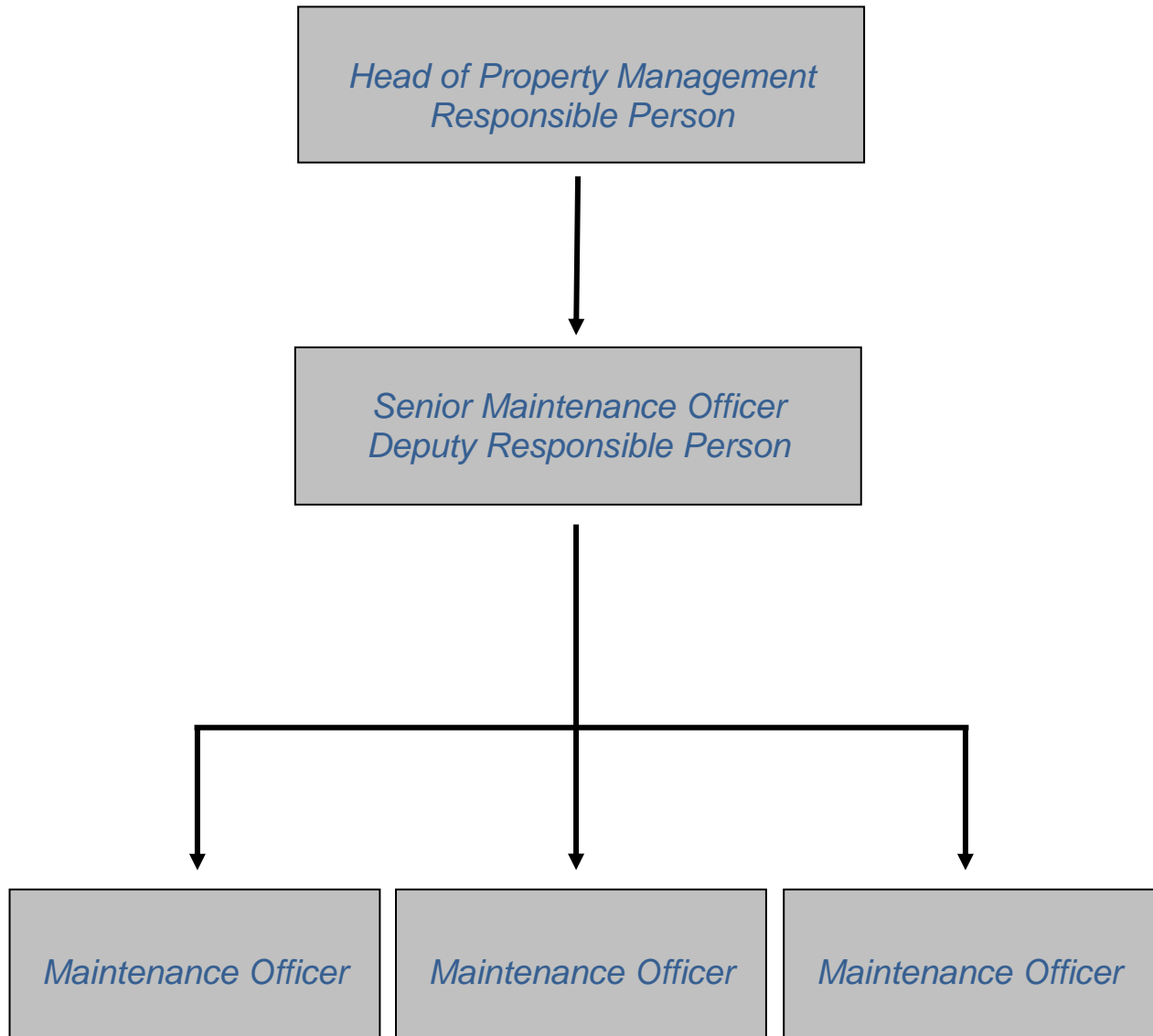
Where test results fall outside parameters, and indicate that control of a system may have been lost, then the water treatment specialist must inform the appointed responsible person or their deputy immediately and confirm their discussions on the same day by email or fax.

## Appendix 2- Communication Pathways

### Main Communication Pathway

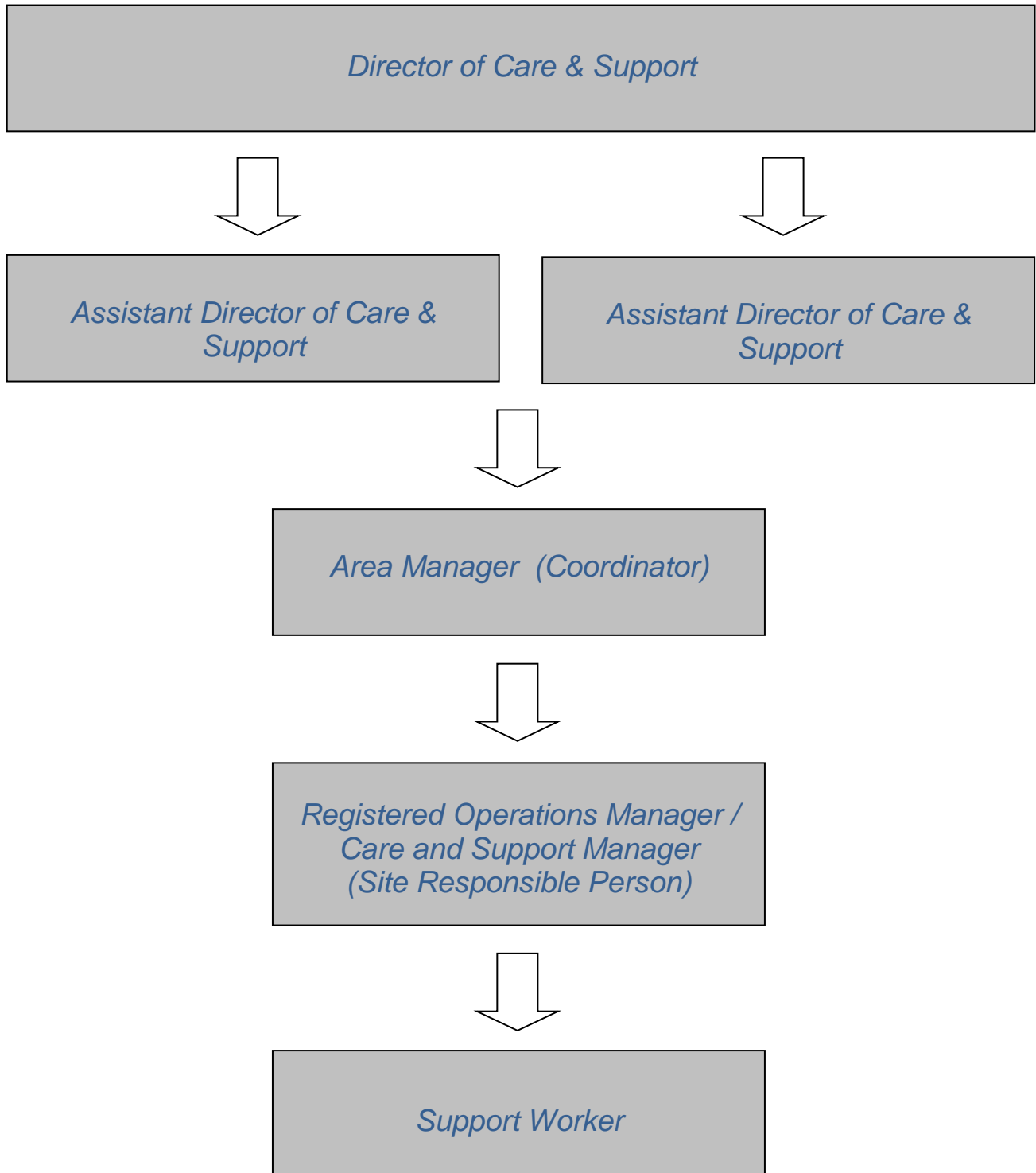


ARK Housing Association Communication Pathway





Care and Support Communication Pathway



## Appendix 3 - Role Clarification and Responsibilities

### **ARK Housing Property Management Department**

#### **1. Head of Property Management**

Overall responsibility for the delivery of all property and maintenance services. Accountable in leading the Property Management team to deliver a range of quality services, whilst ensuring regulatory compliance is achieved through effective monitoring, regular reviews of Policies and Procedures and anticipating legal or compliancy requirements.

The role of Head of Property Management reports directly to the Director of Finance and Housing on all Property Management matters.

The Head of Property Management shall be appointed as the Responsible Person for all matters associated with this Written Scheme and Procedures.

#### **2. Senior Maintenance Officer**

Responsible for the day-to-day delivery of all property and maintenance services. Will assist on Property Management, governance, planning and the ensuring of regulatory compliance whilst monitoring, forecasting and reporting contractors' performances.

The role of the Senior Maintenance Officer reports directly to the Head of Property Management and line manages Maintenance Officers.

The Senior Maintenance Officer shall be appointed as the Deputy Responsible Person for all matters associated with this written Scheme and Procedures.

#### **3. Maintenance Officer**

Contribute to the effective and efficient management of the organisation's day to day maintenance services programmes. Will manage contractors and assist in ensuring all statutory maintenance works are dealt with appropriately and in accordance with the relevant compliances and codes of practice.

The role of the Maintenance Officer reports to the Senior Maintenance Officer on daily matters. The Maintenance Officer shall support the Responsible Person and Deputy Responsible Person in all matters associated with this Written Scheme and Procedures.

### **ARK Housing Property Care and Support Department**

#### **1. Director of Care and Support**

Overall responsibility for the delivery of high quality services across Care and Support (C&S). Responsible for the development and delivery of business development strategies and for ensuring the efficient management of all resources within C&S. Responsible for ensuring the application of policies and procedures relating to the safe and effective delivery of C&S services

#### **2. Assistant Director Care and Support**

Responsible for delivery of high quality services within a specific geographic area. Provides leadership and management support to Area Managers in all aspects of day-to-day delivery of services. Responsible for the management of both HR and financial resources and for leading negotiations with local authorities and participating in appropriate external forum. Ensures the

implementation of policies and procedures and ensures that front line staff are developed and supported to fulfil their roles.

The Assistant Directors shall be responsible, and act as a contact point in supporting all Care & Support staff in carrying out their duties in respect of the management arrangements of this Written Scheme.

They will liaise and communicate all relevant issues with the Responsible Person and the Deputy Responsible Person.

### **3. Area Manager - Coordinator**

Responsible for the day-to-day delivery of services to people supported by ARK. Responsible for the effective management and deployment of resources across specific geographic areas. Leads the local management team to ensure systems and processes are implemented which guide the effective provision of support services. Provides leadership and management to Registered Operations Managers and Care and Support Managers.

The Area Manager shall be responsible for the coordination and communication of all Legionella matters for all locations throughout the areas of responsibility.

They will liaise and communicate all relevant issues with the C & S Assistant Director, ROM's, CSM's and Support Workers, or in their absence the Appointed Responsible Person / Appointed Deputy Responsible Person.

### **4. Registered Operations Manager / Care and Support Manager – Site Responsible Person**

Responsible for the day-to-day delivery of care and support staff teams to people supported by ARK. Provides guidance and supervision to front line staff on all aspects of support provision. Responsible for the deployment of staff resources and ensuring support is organised relating to service users need. Responsible for ensuring all support plans are implemented, reviewed and risk assessments are up to date, which ensures the safe provision of support to people.

The ROM / CSM shall be responsible for the coordination and communication of all Legionella matters for their specific locations and sites. They will ensure that all physical testing and recording tasks undertaken by support staff is carried out in accordance with this written Scheme procedure.

They will liaise and communicate all relevant issues with the Area Manager, and in their absence the Assistant Director of C & S, with direct responsibility in supporting staff in carrying out their daily weekly and monthly tasks.

### **5. Support Worker**

Delivers day-to-day physical, emotional and practical care and support. Ensures all aspects of service users support plans are delivered and monitors the health and wellbeing of service users. Ensures risk assessments are up to date and adhered to and provides social support to people enabling them to participate in the local community.

The support worker shall be responsible for carrying out the daily, weekly and monthly tasks and keeping records in accordance with this written scheme procedure.

They will liaise and communicate all relevant issues directly with the ROM / CSM, and in their absence the Area Manager.

#### **6. Health & Safety Advisor**

The Health and Safety Advisor within ARK provides advice and guidance to a range of management staff across the organisation. The postholder should be sufficiently trained to offer guidance and support to functional managers and to provide ongoing training for all ARK staff in the basic weekly and monthly water hygiene tasks. Recommended training is shown in the table on page 12.

## Appendix 4 - Responsibility Index

Frequency	Task	Responsibility
Weekly	Review list of infrequently used outlets and shower outlets – log results	ARK Housing – C & S
Weekly	Flush infrequently used outlets and shower outlets	ARK Housing – C & S
All occasions	Hot water temperature testing	ARK Housing - C & S
Monthly	Temperature monitoring (sentinel outlets and additional representative outlets)	ARK Housing – C & S
Three monthly	Shower head descaling and disinfection	Clearwater
Six monthly	Cold water tank inspection and temperature measurement	Clearwater
When required	Microbiological sampling of water systems	Clearwater
Annual	Review of water systems management/contract review	Clearwater
When required	Disinfection of Water Services	Clearwater
6 Monthly	TMV failsafe check	Clearwater
Annual	TMV failsafe & strip down	Clearwater
Monthly	Flow & return checks at calorifier	Clearwater
Annual	Hot water storage unit blow down or internal inspection	Clearwater
Two Yearly	Review risk assessment (L8)	ARK Property Management / Clearwater

## Appendix 5 - Contact Details

<b>Statutory duty holder</b>	<b>Chief Executive Officer</b>
Contact	Bobby Duffy
Company	ARK Housing Association
Address	The Priory, Canaan Lane, Edinburgh EH104SG
Telephone No	0131 447 9027
<b>Appointed responsible person</b>	<b>Head of Property Management</b>
Contact	Jackie O'Neill
Company	ARK Housing Association
Address	The Priory, Canaan Lane, Edinburgh EH104SG
Telephone No	0131 447 9027
<b>Deputy appointed responsible person</b>	<b>Senior Maintenance Officer</b>
Contact	Ciorsdan Wilson
Address	ARK Housing Association
Address	The Priory, Canaan Lane, Edinburgh EH104SG
Telephone No	0131 447 9027
<b>Water treatment specialists</b>	<b>Clearwater Technology Ltd</b>
Main contact	Alan Hart
Position/title	Senior Account Manager
Telephone No.	01698 404508
Emergency Telephone No.	01276 21155

## Appendix 6 - Recommended Training

<b>POSITION</b>	<b>RECOMMENDED TRAINING COURSE</b>
Director of Care and Support	Legionella Awareness Training
Director of Finance and Housing	Legionella Awareness Training
Head of Property Management	Responsible Person Training and Legionella Awareness Training
Assistant Director of Care & support	Legionella Awareness Training
Senior Maintenance Officer	Responsible Person Training and Legionella Awareness Training
Area Manager	Legionella Awareness Training
Registered Operations Manager (ROM)	Legionella Awareness Training
Care and Support Manager (CSM)	Legionella Awareness Training
Maintenance Officer	Legionella Awareness Training
Support Worker	Introduction to Legionella
Health & Safety Advisor	Responsible Person Training and Legionella Awareness Training