

How I see to deal with Housing Stock

I have often worked with groups of ‘responsible persons‘ working for some of the larger housing associations and usually have long discussions with regards to the approach to legionella management in **individually occupied homes**, consisting of houses, bungalows and flats, owned or managed by the associations. I usually provide a copy of the HSE leaflet ‘Essential information for providers of residential accommodation’ (INDG376) and my advice is as follows:

Advice:

All domestic properties with water systems carry a risk and, taking into account the balance of risk of a case or outbreak of LD against business sacrifice (cost, time, trouble), the risk from each property should be properly assessed by a competent person and control measures established and implemented. My recommendations of how this is undertaken are as follows:

Assessing the risk:

Establish a programme of inspections over a realistic timescale relative to number of properties and affordability, such that the risks from all properties (grouped by property type if identical properties or water systems are present) are assessed based around the following criteria:

- Likelihood of generation of breathable water droplets
- Susceptibility of the occupants
- Type, age and condition of the water systems present
- Extent of compliance of the plumbing installation with the Water Supply (Water Fittings) Regulations 1999 (especially regarding contamination protection)

Risk Management & Control:

Once the level of risk has been established and the control measures identified - almost always as hot and cold water temperature plus shower/spray head hygiene and flushing of little used outlets is involved – an appropriate method of monitoring these controls is required. Again, my recommendation of what is reasonably practicable is to ensure that the water systems are capable of controlling the risk using these measures and effectively communicate the requirements for maintaining temperatures, etc to the tenants and they reciprocating with a signature of proof they have had this information . This approach, whilst not strictly in line with the recommendations of L8, allows the housing associations to minimise tenant disruption and avoid excessive costs.

Case Study:

I have worked with numerous housing association and they have implemented my recommendations, including the following:

- Implemented a policy document, established a management structure with clear lines of control and communication, and responsible persons have received appropriate training
- Established a programme of around 3,000 property inspections which they are looking to complete over a 5 year period

- Use the 'void' (tenant change) process to access the properties initially – gaining access to a cross section of properties and interfacing with other home improvement works (eg bathroom or kitchen replacements) flushing and disinfecting prior to re letting with certification
- Communicate the requirements for maintaining and monitoring the control measures to the tenants in writing in the 'Tenant Information Pack' (including information on legionnaires' disease and advice on where they can get help or advice)
- Requested plumbing and heating service providers to ensure all staff gain legionella awareness through training
- Appointed a competent legionella service provider

Those that have shared facilities or communal areas of landlords water, it is like a hotel but never leaving it, in which case the normal requirements of risk assessments, written scheme, monitoring regularly (monthly, quarterly, six monthly, annual and update of risk assessments at least every other year if no changes) and remedials all in line with L8 must be carried out and in most cases given to responsible service providers in legionella control, although this does not relinquish the responsibility by the responsible person.



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