

# Legionella Control Policy

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| Originator:                              | Regulatory Compliance Team |
| Executive Management Team Approval Date: | February 2024              |
| Review date:                             | February 2027              |

| 1   | Introduction                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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| 1.1 | One Vision Housing (OVH) treats the health and safety of tenants, staff, contractors and other users of its buildings of paramount importance. In meeting its health and safety duties, OVH will ensure it has in place effective and comprehensive measures to prevent or control the spread of Legionellosis (including legionnaires' disease).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 1.2 | Legionnaires' disease is a potentially fatal pneumonia caused by Legionella bacteria and is the most serious form of a group of diseases known as Legionellosis. Legionella bacteria are common in natural water sources and can if the right conditions exist (usually temperatures between 20 – 45°C and where there is a supply of nutrients such as rust, sludge, scale, algae and other bacteria in a bio-film) proliferate in artificial water systems, capable of producing an aerosol or water vapour.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 1.3 | This Policy sets out the measures OVH puts in place to assess the risks posed by Legionella bacteria and the control systems established to mitigate or eradicate these risks as far as is reasonably possible.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 1.4 | <p>This Policy also sets out OVH's responsibilities to comply with the relevant legislation and associated regulatory guidance on the control of Legionella bacteria in water systems. Key legislation and guidance includes:</p> <ul style="list-style-type: none"> <li>• BS 8580-1:2019 Water Quality. Risk assessments for Legionella control. Code of Practice</li> <li>• BS8680 – Water quality – Water safety plans – Code of practice</li> <li>• ACOP- L8 – The Control of Legionella Bacteria in Water Systems – Approved Code of Practice and Guidance 2013, Part 3</li> <li>• Health and Safety at Work Act 1974</li> <li>• The Management of Health and Safety at Work Regulations 1999</li> <li>• Control of Substances Hazardous to Health Regulations 2002</li> <li>• The Public Health (Infectious Diseases) Regulations 1988</li> <li>• The Water Supply (Water Fittings) Regulations 1999</li> <li>• The Water Supply (Water Quality) Regulations 2018</li> <li>• Homes (Fitness for human Habitation) Act 2018</li> <li>• The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013</li> <li>• HSG 247 - Asbestos: The licensed contractors' guide</li> <li>• BS EN 8558 Guide to the design, installation, testing and maintenance of services supplying water for domestic use within buildings and their curtilages</li> </ul> |

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| 1.5   | <p>The application of this Policy ensures that OVH complies with the outcomes of the Regulatory Framework for Social Housing in England as follows:</p> <ul style="list-style-type: none"> <li>• Registered providers must provide an effective, efficient and timely repairs, maintenance and planned improvements service for the homes and communal areas for which they are responsible</li> <li>• When acting as landlords, registered providers must take all reasonable steps to ensure the health and safety of tenants in their homes and associated communal areas</li> </ul> |
| 1.6   | <b>Access and Communication</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 1.6.1 | OVH is committed to ensuring that the services it provides are accessible to everyone. OVH will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for OVH or use its services.                                                                                                                                                                                                                                                                                                         |
| 1.6.2 | Working with our customers we have established a Vulnerable Persons and Reasonable Adjustments Policy to ensure we make best use of every customer interaction to meet customers' needs in our service delivery and ensure this information is kept up to date.                                                                                                                                                                                                                                                                                                                         |
| 1.7   | <b>Equality, Diversity and Human Rights</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 1.7.1 | OVH is committed to fairness and equality for all customers, colleagues, and stakeholders.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 1.7.2 | OVH's approach to Equality, Diversity, and Inclusion (EDI) goes beyond legal or statutory obligations, however, OVH will meet or exceed its legal requirements as outlined in the Equality Act 2010 and the Human Rights Act 1998. This policy also demonstrates how OVH will meet the requirements of Public Sector Equality Duties, which it has chosen to adopt and implement as a matter of good practice rather than as a legal obligation.                                                                                                                                        |
| 1.7.3 | OVH is fully committed to eliminating unfair and unlawful discrimination. Hate Crime, Harassment, and Bullying will also not be tolerated, and take proactive steps to prevent such behaviours.                                                                                                                                                                                                                                                                                                                                                                                         |
| 1.7.4 | <p>It is unlawful to discriminate directly or indirectly based on the following protected characteristics:</p> <ul style="list-style-type: none"> <li>• Disability</li> <li>• Gender</li> <li>• Gender identity, or gender reassignment status</li> <li>• Race, racial group, ethnic or national origin, or nationality</li> <li>• Religion or belief</li> <li>• Sexual orientation</li> <li>• Age</li> <li>• Marriage or civil partnership status</li> <li>• Pregnancy or maternity</li> </ul>                                                                                         |
| 1.7.5 | OVH are also committed to ensuring that individuals are not treated less favourably due to their social, economic, or cultural backgrounds, as well as specific medical conditions as defined in the Equality Act.                                                                                                                                                                                                                                                                                                                                                                      |

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| 1.7.6    | OVH regularly review policies and practices to ensure they reflect its commitment to equality and diversity.                                                                                                                                                                                                                                                                                                   |
| 1.8      | <p>This Policy should be read in conjunction with:</p> <ul style="list-style-type: none"> <li>• OVH Health and Safety Policy</li> <li>• OVH Repairs, Maintenance and Planned Works Policy</li> <li>• OVH Access to Properties Policy</li> </ul>                                                                                                                                                                |
| <b>2</b> | <b>Statement of Intent</b>                                                                                                                                                                                                                                                                                                                                                                                     |
| 2.1      | OVH will comply with all legal and regulatory requirements in meeting its responsibilities to prevent and control the proliferation of Legionella bacteria from artificial water systems in buildings it owns and controls.                                                                                                                                                                                    |
| 2.2      | OVH will appoint a 'Competent Person or Persons' (see Section for 3.2 details) to identify and assess risks from Legionella bacteria in OVH owned and controlled buildings and carry out a comprehensive risk assessment in conjunction with suitably qualified contractors.                                                                                                                                   |
| 2.3      | Having established a baseline position of equipment and services that pose a reasonably foreseeable risk of proliferation of Legionella bacteria, the Competent Persons will devise a control scheme to manage and mitigate any risks identified including appropriate testing regimes, treatment methods and general design and installation considerations.                                                  |
| 2.4      | OVH will co-operate fully with any emergency planning contingencies and investigations by Local Authorities and Health and Safety Executives in the areas of its operation, in the unlikely event of any major Legionella outbreak in or affecting buildings it owns and controls.                                                                                                                             |
| <b>3</b> | <b>Policy</b>                                                                                                                                                                                                                                                                                                                                                                                                  |
| 3.1      | <b>Duty Holders Responsibilities</b>                                                                                                                                                                                                                                                                                                                                                                           |
| 3.1.1    | OVH as the owner of properties and buildings where artificial water systems are present, will have responsibility to identify and manage the risks posed by Legionella bacteria. The Operations Director - Assets and Compliance) fulfils the role of Duty holder for OVH with direct line management over the appointed 'Competent Persons', the Building Safety & Compliance Manager and Compliance Officer. |
| 3.1.2    | The Competent Persons will provide regular reports to the Duty Holder on the operation of the Legionella control system and to the OVH Executive Management Team, as required by any major incidents.                                                                                                                                                                                                          |
| 3.2      | <b>Competent Persons Responsibilities</b>                                                                                                                                                                                                                                                                                                                                                                      |
| 3.2.1    | <p>The Competent Persons, the Building Safety &amp; Compliance Manager and Compliance Officer will work in conjunction with the Appointed Specialist Contractors to carry out risk assessments, which as a minimum will establish the following risk factors:</p> <ul style="list-style-type: none"> <li>• The presence of Legionella bacteria</li> </ul>                                                      |

- If conditions are present that will encourage bacteria to multiply (see 1.2)
- If it is possible that water droplets i.e. an aerosol can be produced which could be dispersed over a wide area
- If it is likely that anyone considered to be more at risk (those over 45, smokers and heavy drinkers, those suffering chronic respiratory or kidney disease) will come into contact with contaminated water droplets
- The potential for scalding (from heating water above 60°C to kill Legionella bacteria)

3.2.2

When assessing water systems in OVH properties and buildings that are likely to pose a risk from the proliferation of Legionella bacteria, the risk assessment will focus on the following:

- The source of the system supply water, for example, whether from a mains supply or not
- Possible sources of contamination of the water supply
- The normal operating conditions of the equipment or system
- Unusual, but reasonably foreseeable operating conditions such as breakdowns

3.2.3

The Competent Persons, will ensure that the risk assessment process is dependent on the current risk rating of the building or if there are significant changes to water systems or their use, including the addition of new buildings to the OVH portfolio or:

- The availability of new information about risks or control measures that is issued from the Health and Safety Executive, or to stay in line with best practice
- The results of inspections indicate that control measures are no longer effective
- A case of Legionellosis is associated with a water system in OVH's control

3.2.4

The Competent Persons will use the risk assessment process to inform the operation of a Control Scheme, which sets out the necessary precautions to:

- **Prevent the growth of Legionella bacteria** including:
  - The avoidance of water temperatures that favour proliferation of Legionella bacteria and other micro-organisms
  - The avoidance of water stagnation (tank cleaning to prevent bio-films forming, removing dead legs and redundant pipework where required)
  - The avoidance of the use of materials that harbour bacteria and other micro-organisms, or provide nutrients for microbial growth and complying with the *Water Fittings and Materials Directory* for plumbing fittings and water appliances:
    - Controlling the release of water spray
    - Maintaining the cleanliness of the system and water in it
    - Using water treatment techniques
    - Taking action to ensure the correct and safe operation of the water system
- **Operate control measures to treat water in systems** (to be determined in conjunction with the Appointed Specialist Contractor, which includes cleaning and disinfection, chemical disinfection and thermal disinfection, as required)
- **Ensure the correct use of and maintenance of systems** (including provision of work instructions for operatives carrying out maintenance tasks and in conjunction with the Health and Safety Team, ensuring appropriate signage is in place to prevent scalding incidents)

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| 3.2.5 | The Competent Persons will carry out an annual audit of the Control Scheme to assess its effectiveness and the competence of the Appointed Specialist Contractors, ensuring they have been issued with the Legionella Control Association's Recommended Code of Conduct.                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 3.3   | <b>Specialist Appointed Contractors Responsibilities</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 3.3.1 | OVH will employ an Appointed Specialist Contractor to carry out periodic inspections and monitoring (including sampling and testing) of OVH's water systems in accordance with the requirements of the Control Scheme.                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 3.3.2 | The Appointed Contractor, in close liaison with the Compliance Team will execute any control measures required to mitigate the risks of Legionella bacteria and will supply OVH with recommendations for any remedial works identified during periodic inspections.                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 3.3.3 | The Compliance Team will arrange for remedial works to be carried out by OVH's contractors or may, depending on the nature and technical complexities of the works identified, instruct the Appointed Specialist Contractor to carry out the remedial works.                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 3.3.4 | The Appointed Contractor will carry out an annual internal audit of their own operations and will provide a report to the Competent Persons on request to ensure that they continue to hold and comply with all the requirements of the Legionella Control Association's Recommended Code of Conduct.                                                                                                                                                                                                                                                                                                                                                                                             |
| 3.4   | <b>Void Properties</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 3.4.1 | <p>OVH will operate robust measures to reduce the risk of Legionella in void properties due to stagnant water systems and implement other measures where necessary to reduce future risk i.e.:</p> <ul style="list-style-type: none"> <li>• OVH will ensure that water systems in all long-term void properties are drained, cleaned and disinfected</li> <li>• OVH Void Team surveyors will identify and arrange for risk elimination or reduction measures in all void properties which includes removing dead legs, replacing shower heads and non-WRAS approved flexible hoses</li> </ul>                                                                                                     |
| 3.5   | <b>Legionella Control in Low-Risk Domestic Properties</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 3.5.1 | <p>In most residential settings, a simple assessment may show that the risks are low, and no further action may be necessary. An example of a typical lower risk situation may be found in a small building (e.g., housing unit with small domestic-type water systems), where daily water usage is inevitable and sufficient to turn over the entire system where:</p> <ul style="list-style-type: none"> <li>• cold water is directly from a wholesome mains supply (no stored water tanks)</li> <li>• hot water is fed from instantaneous heaters or low volume water heaters (supplying outlets at 50 °C) and</li> <li>• where the only outlets are toilets and wash hand basins).</li> </ul> |
| 3.5.2 | If the assessment shows the risks are low and are being properly managed, no further action is needed but it is important to review the assessment regularly in case anything changes in the system.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

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| 3.5.3 | OVH have completed a generic risk assessment for legionella control in low-risk domestic properties, with actions identified and implemented through day to day operational procedures. This risk assessment is reviewed at least once per annum by the Competent Persons to ensure it remains suitable and sufficient for the control of legionella in OVH low risk properties.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 3.6   | <b>Communication</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 3.6.1 | <p>OVH will ensure clear lines of communication are established and are effective at all times. The Competent Persons (or Deputy if not available) will communicate regularly with the Specialist Appointed Contractor (normally on a monthly cycle or more immediately as required). At a minimum the following issues will be discussed:</p> <ul style="list-style-type: none"> <li>Any changes or additions to the water systems in OVH properties requiring inclusion on the Control Scheme</li> <li>The Appointed Contractor to inform the Compliance Team of any remedial actions required as a result of inspection or any other significant matters affecting the control of Legionellosis</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 3.6.2 | <p>If during routine checking Legionella bacteria are found at levels which pose a risk to health and safety or there are confirmed outbreaks of Legionellosis in areas where OVH has properties, communication between the Specialist Appointed Contractor, Duty Holder and Executive Management Team (EMT) will take effect at the earliest opportunity.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 3.7   | <b>Record Keeping</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 3.7.1 | <p>The Competent Persons will be responsible for ensuring appropriate records are kept for all measures associated with OVH's management of Legionellosis. In accordance with the Health and Safety Executive Accepted Code of Practice, records will be kept of the following:</p> <ul style="list-style-type: none"> <li>The names and positions of all people carrying out tasks within the OVH Control Scheme</li> <li>The risk assessment and Control Scheme (which will be updated with each action, addition or alteration)</li> <li>Plans or schematics of the areas, equipment and systems covered in the OVH Control Scheme</li> <li>Details of any control or precautionary measures undertaken by the Specialist Appointed Contractor or OVH operatives</li> <li>Details of all remedial work carried out</li> <li>All visits by contractors, consultants and other personnel associated with the operation of OVH's Control Scheme</li> <li>Cleaning and disinfection procedures and associated reports and certificates</li> <li>Results of all sampling and testing undertaken</li> <li>Details of all chemical / biological treatments used in control measures</li> <li>All training provided to operatives and the Competent Persons that play a role in OVH's Control Scheme and overall arrangements for Legionellosis management (to be retained by the People and Learning Team)</li> <li>Details of the current state of operation of OVH's water systems that could pose a risk of Legionellosis bacteria and any periods where they are inactive and require draining down</li> </ul> |

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| 3.7.2    | All retained records kept be dated and signed or show some other form of authorisation from the person carrying out the actions e.g. inspections will be signed by the Appointed Specialist Contractor's Operative(s).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 3.7.3    | Records will be kept electronically within the Appointed Specialist Contractor's systems and copies will also be archived in OVH systems for a minimum period of two years and five years for any records relating to monitoring, inspection, tests or checks. The Compliance Team will have viewing access and can provide viewing access to other interested parties, on request.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 3.8      | <b>Actions in the event of a Legionellosis Outbreak</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 3.8.1    | <p>Should an outbreak of Legionellosis occur (defined by the Public Health Laboratory Service (PHLS) as two or more confirmed cases of Legionellosis occurring in the same locality within a six-month period), the Operations Director - Assets and Compliance will:</p> <ul style="list-style-type: none"> <li>• Liaise with the Proper Officer from either the Local Authority or the Local Health and Safety Executive who will invoke an Outbreak Committee</li> <li>• Inform the OVH Executive Management Team and Appointed Specialist Contractor at the earliest opportunity</li> <li>• Comply with all requests for information / actions required to control an outbreak including shutting down of systems, cleaning or treatment works as required by the Outbreak Committee</li> <li>• Ensure the Outbreak Committee receives information relating to staff sickness records to determine if there are any undiagnosed cases of Legionellosis related illness</li> </ul> |
| <b>4</b> | <b>Implementation</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 4.1      | All OVH staff have a responsibility for ensuring buildings owned or controlled by OVH have adequate protection from the risks of Legionellosis bacteria proliferation as part of the general requirements to comply with Health and Safety regulations. Whilst not all staff will have specific duties in regard to Legionellosis control measures, they will need to have an awareness of the Policy to deal with any customer enquiries that may arise.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 4.2      | The Competent Persons will have overall responsibility for ensuring OVH has in place adequate measures to eradicate or control risks from Legionellosis bacteria (see section 3.2 for specific responsibilities).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 4.3      | Relevant staff will receive Legionella Awareness Training and refreshers using our E- Learning suite.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>5</b> | <b>Performance</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 5.1      | OVH have a target to ensure legionella risk assessments remain in date in line with required frequencies.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

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| 6                              | Consultation                                                                                                                                                                                                                                                   |                                                                                                                                           |                      |                                                                                                                                                                                                                                  |
| 6.1                            | Specific input of technical advice has been sought from those staff with operational knowledge of Legionellosis control management. The Customer Policy and Strategy Review Group have also been consulted in the development of this Policy.                  |                                                                                                                                           |                      |                                                                                                                                                                                                                                  |
| 7                              | Review                                                                                                                                                                                                                                                         |                                                                                                                                           |                      |                                                                                                                                                                                                                                  |
| 7.1                            | The Policy will be reviewed at least once every 3 years from the date of approval to ensure its continuing suitability, adequacy and effectiveness or as required by the introduction of new legislation or regulation that impacts on the obligations of OVH. |                                                                                                                                           |                      |                                                                                                                                                                                                                                  |
| 8                              | Equality Impact Assessment                                                                                                                                                                                                                                     |                                                                                                                                           |                      |                                                                                                                                                                                                                                  |
| 8.1                            | Was a full Equality Impact Assessment (EIA) required?                                                                                                                                                                                                          | No                                                                                                                                        |                      |                                                                                                                                                                                                                                  |
| 8.2                            | When was EIA conducted and by who?                                                                                                                                                                                                                             | An EIA Relevance Test was conducted by the Strategic Regulatory Compliance Manager and the Quality and Inclusion Officer in January 2023. |                      |                                                                                                                                                                                                                                  |
| 8.3                            | Results of EIA                                                                                                                                                                                                                                                 | The EIA Relevance Test did not reveal any differential or adverse impacts for any of the groups with protected characteristics.           |                      |                                                                                                                                                                                                                                  |
| 9                              | Scheme of Delegation                                                                                                                                                                                                                                           |                                                                                                                                           |                      |                                                                                                                                                                                                                                  |
| 9.1                            | Responsible committee for approving and monitoring implementation of the policy and any amendments to it                                                                                                                                                       | EMT                                                                                                                                       |                      |                                                                                                                                                                                                                                  |
| 9.2                            | Responsible officer for formulating policy and reporting to committee on its effective implementation                                                                                                                                                          | Operations Director - Assets and Compliance                                                                                               |                      |                                                                                                                                                                                                                                  |
| 9.3                            | Responsible officer for formulating, reviewing and monitoring implementation of procedures                                                                                                                                                                     | Operations Director - Assets and Compliance                                                                                               |                      |                                                                                                                                                                                                                                  |
| 10                             | Amendment Log                                                                                                                                                                                                                                                  |                                                                                                                                           |                      |                                                                                                                                                                                                                                  |
| Date of revision:              |                                                                                                                                                                                                                                                                | Reason for revision:                                                                                                                      | Consultation record: | Record of amendments:                                                                                                                                                                                                            |
| 15 <sup>th</sup> November 2022 |                                                                                                                                                                                                                                                                | In line with the Review Schedule                                                                                                          | See Section 6        | <ul style="list-style-type: none"><li>Change at 1.8.4- Inclusion of the Repairs, Maintenance and Planned Works Policy</li><li>Change ay 4.3 – Inclusion that relevant staff will receive Legionella Awareness Training</li></ul> |



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|                                |                                   |               | and refreshers using our E-Learning suite.                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 1 <sup>st</sup> August 2023    | In line with the Review Schedule  | See Section 6 | <ul style="list-style-type: none"> <li>• There are no significant changes in this review</li> <li>• The EIA Relevance Test has been updated</li> <li>• In Line with Board approved process the review period for this Policy will now be every Three years rather than annually</li> </ul>                                                                                                                                                                       |
| 20 <sup>th</sup> February 2024 | In line with operational practice | See Section 6 | <ul style="list-style-type: none"> <li>• Numbering changed throughout</li> <li>• Relevant legislation updated at 1.4</li> <li>• Revised responsibilities and job titles changed throughout</li> <li>• New Section inserted at 3.5 on Legionella Control in Low-Risk Domestic Properties</li> <li>• Team names updated throughout</li> <li>• Equality, Diversity and Human Rights statement updated</li> <li>• EIA Relevance Test updated at Section 8</li> </ul> |