




THE ST. BART'S  
ACADEMY  
— TRUST —

**Legionella Management  
Policy**

**June 2019**

# The St. Bart's Academy Trust

## Legionella Management Policy

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# 1. Introduction

## 1.1 Statement of Intent

The St. Bart's Multi Academy Trust (SBMAT) is committed to protecting the health, safety and welfare of all employees and others affected by its work. We recognise our responsibilities to comply with the Health and Safety at Work Act (1974), Management of Health and Safety at Work Regulations 1999 and the Approved Code of Practice and Guidance 'Legionnaires' disease 'The control of legionella bacteria in water systems (ACOP L8).

All reasonable steps will be taken to identify potential legionella hazards in the workplace and to prevent or minimise the risk of exposure.

## 1.2 Legionnaires' Disease

Legionella is a generic term for a type of bacteria which is common in natural and artificial water systems and is a collective term for diseases caused by legionella bacteria including the most serious legionnaire's disease, as well as the similar but less serious conditions of Pontiac fever and Lochgoilhead fever. Legionnaires' disease is a potentially fatal form of pneumonia and everyone is susceptible to infection. The risk increases with age, but some people are at higher risk, e.g. people over 45, smokers and heavy drinkers, people suffering from chronic respiratory or kidney disease, diabetes, lung and heart disease or anyone with an impaired immune system.

The incubation period ranges between two and ten days and usually begins with a headache, muscular pain and a general feeling of being unwell. These symptoms are followed by high fever and shaking chills. Nausea, vomiting and diarrhoea may occur. On the second or third day, dry coughing develops and is often accompanied by breathing difficulties. Effective treatment may be achieved by the use of antibiotics.

It is normally contracted by inhaling legionella bacteria, either in tiny droplets of water (aerosols), or in droplet nuclei (the particles left after the water has evaporated) contaminated with legionella, deep into the lungs. Such droplets can be created, for example, by hot and cold-water outlets; atomisers; wet air conditioning plant; and whirlpool or hydrotherapy baths. There is evidence that the disease may also be contracted by inhaling legionella bacteria following ingestion of contaminated water by susceptible individuals. Person-to person spread of the disease has not been documented. Control is normally achieved by suitable design and maintenance of the water system and its associated plant. Additional control is achieved by appropriate storage of water and delivery of water at temperatures which do not allow the bacteria to proliferate.

Legionella bacteria also require a supply of nutrients to multiply. Sources can include the presence of sediment, sludge and scale, together with biofilms, which can all play an important role in harbouring and providing favourable conditions in which legionella bacteria may grow. Biofilm, sludge and scale can protect legionella bacteria from temperatures and concentrations of biocide that would otherwise kill or inhibit these organisms if they were freely suspended in the water. Water temperatures in the range of 20°C to 45°C seem to favour growth. The organisms do not appear to multiply below 20°C and will not survive above 60°C.

## 2. Responsibilities

### Principal

The Principal shall undertake the duties of the 'Duty Holder' and appoint a person (Responsible Person) to take day-to-day responsibility for controlling any identified risk from legionella bacteria. Having made the appointments, the Principal is to have in place suitable and sufficient monitoring regimes to ensure that their responsibilities are being discharged. The Responsible Person must be appointed in writing, if this person is not the Principal - **Appendix 1**.

The employment of contractors or consultants to implement the necessary controls to prevent the proliferation of legionella bacteria can be implemented, but the Responsible Person must ensure they are competent to undertake the tasks required.

### Responsible Person

The responsible person shall ensure that a suitable and sufficient assessment is conducted in order to identify and assess the risk of exposure to legionella from work activities and water systems on the premises under the control of the Principal and any necessary precautionary measures required to reduce the risk of exposure to as low as reasonably practicable.

They will ensure that organisations such as water treatment companies or consultants together with site staff are competent and suitably trained, and have the necessary equipment to enable them to carry out their duties in a safe and proper manner.

The responsible person shall ensure that appropriate records are kept, including:

- Details of the persons responsible for managing, conducting the risk assessments and implementing a written scheme.
- The significant findings of the risk assessments and any remedial action taken.
- The written scheme required for controlling the risk to exposure and details of its implementation.
- The dates and results of any monitoring, inspections, tests or checks carried out, including information as to whether the system is in operation or not.
- Calibration certification of temperature measurement equipment used.
- Ensure any Site Staff (Appointed Persons) carry out their tasks correctly and on time.

The above mentioned records will be retained for a minimum of five years.

### Appointed Persons

Appointed persons are members of site staff with duties that may include:

- Checking temperature control/foreign bodies etc. in water systems and reporting concerns to the responsible person.
- Carrying out weekly/holiday flushing as directed.
- Monitoring disinfection procedures where necessary
- Being responsible for maintaining water log books. Records are to be kept for each water outlet of flushing and testing and any disinfection procedures.
- Reporting to the responsible person the condition or situation relating to Legionella which may affect the safety of any premises users.

- Advising any changes to the water systems to enable the risk assessment / written scheme to be updated accordingly.
- Attending appropriate training courses.

### 3. Information & Training

The Principal will ensure that any staff appointed with responsibilities towards water hygiene have access to suitable and sufficient information and training.

Staff can complete Legionella Awareness training via Flick Learning.

Additional guidance can be found here <http://www.hse.gov.uk/pubns/priced/l8.pdf>

Any staff given additional responsibilities to control the water system must have their training needs identified and met by suitable training, which will be sought by the Principal.

### 4. Risk Assessment

The duty holder/responsible person shall instruct a water hygiene consultant to undertake legionella risk assessments at the school site. The risk assessments are to contain a schematic diagram, assets list, a written scheme and monitor whether control measures are being instigated fully, correct water temperatures are being maintained and engineering measures, such as temperature control valves, are working properly. A copy of this should be kept readily available with the water hygiene log book on site.

The duty holder/responsible person shall instruct the water hygiene consultant to review the risk assessments within 2 years of each risk assessment being produced. The water hygiene consultant shall also be instructed to review the risk assessment where the water supply system has been modified or renewed, and where there is evidence of a serious break down in control measures.

### 5. Competence

Those who are appointed to carry out the control measures and strategies will be suitably informed, instructed and trained and have their suitability assessed. They should be trained to a standard, which ensures that tasks are carried out in a technically safe and competent manner. Competence is dependent on the needs of the situation and the nature of the risks involved. To maintain competence periodic refresher training should be provided and records maintained of all training undertaken.

### 6. Outbreak of Legionellosis

In the event of an outbreak, the following will take place:

- Identification of people who may have been exposed.
- Involvement of public health authorities.
- Dissemination of information to employees and other interested parties as to the nature of the risks.

Cases of Legionellosis are reportable under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR 2013). A confirmed case of Legionellosis by a medical professional must be reported by the employer.

On receipt of the medical diagnosis, the Principal is to report the incident to the SBMAT appointed Health & Safety professional, following reporting procedures.

## **7. Safe System of Work**

### **Avoiding Conditions Favouring Growth of Organisms**

The use of materials that may provide nutrients for microbial growth should be avoided. Corrosion, scale deposition and build of bio films and sediments should be controlled and tanks should be lidded.

As far as practicable, water systems will be operated at temperatures that do not favour the growth of Legionella. The recommended temperature for outgoing hot water is 60°C and should be at least 50°C within one minute of running the water via an outlet. The cold-water outlet temperature should be below 20°C after two minutes running.

Single cold and hot tap on the main hot and cold water systems, which are not connected via a thermostatic mixing valve, are each to be run for the desired time every month so that a temperature can be taken using a thermometer and the results recorded on the Water Temperature Check List.

If the desired temperatures cannot be maintained, then professional assistance must be sought immediately.

Scientific tests may be required when there appears to be a problem with the water supply, e.g. discolouring, temperature problems, etc.

If a positive Legionella test is reported there is to be a re-test every 3 or 6 months, dependent upon the test results, until two consecutive clear readings are established.

### **Avoidance of Stagnation**

Dead-legs, which occur when water services leading from the main circulation water system to taps or appliances are used only intermittently, and other parts of systems that may provide a reservoir for infection, are to be eliminated.

All seldom used water outlets (hot & cold) are to be flushed through weekly and a record kept in writing on the Water Outlet Flushing Checklist by the person carrying out the flushing. Flushing will last for at least two minutes at a reasonable flow rate.

Where water outlets are routinely used, then this acts as the flushing routine and additional flushing is not required. However, flushing will always be required for all water outlets during periods of none use which exceed four days. Flushing is only required at the end of the period of non use.

### **System Maintenance**

The system will be maintained in-line with the recommendations from the Water Hygiene Risk Assessment, by competent water hygiene professionals.

### **Testing**

Under certain circumstances, for example when there have been alterations or maintenance work to the water system, testing of water temperatures and the flushing of outlets is to be carried out.

## Sampling

Sampling for Legionella should not normally be necessary, unless in the case of an outbreak or to monitor the effectiveness of precautionary measures. Where there is a reason to believe that sampling is required (e.g. if temperatures are showing high/low and other means of correcting have not worked) they can be taken to ensure the system is not contaminated, until further investigation or rectification can be carried out.

## Disinfection

If the school produces a sufficiently high result after testing, arrangements are to be made with an approved contractor to carry out disinfection of the water system.

The responsible person is to arrange the time and date of disinfection with the selected contractor.

Affected areas are to be withdrawn from use until disinfection has been completed. Flushing of outlets in these areas will cease until disinfection has been completed.

A supply of clean water for the kitchen area is to be drawn off from an uncontaminated source and stored in containers on the morning of a disinfection visit.

Once disinfection commences, the water system must not be usable (except in WC's) until the contractor declares it safe. (Note: Drinking water must only be drawn from the bottled supply).

Alternative hand cleaning methods are to be instigated to supplement the wearing of protective gloves for personal care. (e.g. Hibiscrub & antiseptic wipes).

Staff and pupils are to be protected from accidental use or drinking of disinfected water by securing the outlets or denying them access.

Disinfected areas are to be re-instated immediately after completion of the disinfection process and the flushing regime is to recommence.

## 8. Record Keeping

Accurate and comprehensive records are essential and will be kept in order to demonstrate that due diligence and reasonable precautions have been put in place in order to avoid non-compliance with the regulations.

All legionella related documents arising from activities will be retained in order to fulfil the above requirements.

The following are examples of information to be retained:

- Names of people responsible for carrying out various tasks under the written scheme.
- A risk assessment and written scheme of action and control measures.
- Plans or schematic drawings of the system.
- Details of precautionary measures carried out such as temperature control checks and weekly/holiday flushing including dates and evidence to suggest that these have been carried out correctly.
- Remedial work required and carried out including dates.



- Log detailing visits by contractors, consultants and other personnel. Cleaning and disinfection.
- Results of analysis of water samples.
- Training records of personnel.
- Name and position of people or persons who have responsibilities for implementing the scheme, their respective responsibilities and their lines of communication.
- Current state of operation of the system.
- Signature of the person carrying out the work where appropriate.
- Calibration certification of temperature measurement equipment used.

Records will be retained for at least five years.

## 9. References

### **HSE L8 Approved Code of Practice**

<http://www.hse.gov.uk/pubns/books/l8.htm>

# Appendix 1

**TO BE COMPLETED ON ACADEMY HEADED PAPER**

Insert Date xx/xx/xxxx

Dear (Insert First Name),

**Responsible Person – Legionella Management**

You are nominated as the Responsible Person for Legionella Management tasks within this setting, as specified under the Health & Safety Executive Approved Code of Practice and guidance document, L8 (Fourth Edition and any subsequent editions) Legionnaires' disease, The control of legionella bacteria in water systems 2013.

You must undertake the duties attributed to your role as listed within the SBMAT Legionella Management Policy and the on-site Water Hygiene Risk Assessment.

Yours sincerely,

(Name)

(Position & Academy)

.....

I accept the appointment mentioned above and acknowledge receipt of the mentioned documentation.

Title: .....

Name: .....

Signature: .....

Date: .....





# THE ST. BART'S ACADEMY

— TRUST —

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