



INSPIRATION THROUGH COLLABORATION

Legionella

Approved by: Trust Board

Last reviewed: July 2024

Next review due: July 2025

LEGIONELLA

1. Objective, Scope, and Principles

This policy is designed to give clear guidance on arrangements for managing the risk of exposure to legionella bacteria. It is written and approved at board level, but applies to all employees, trustees and governors of schools, settings, and services, hereafter the 'organisations,' within The Claxton Trust.

This policy should be read in conjunction with the Corporate and Local Health and Safety policies.

The policy covers all activities under the control of the trust and is relevant to all premises that the trust has a direct maintenance responsibility for. Where The Claxton Trust is not responsible for maintenance, financially or otherwise; or where premises do not come under the direct responsibility of the trust, this policy will be commended to responsible parties and The Claxton Trust will ensure that there are adequate legionella management processes in place.

2. Introduction

The Claxton Trust recognises its responsibilities under general health and safety law to consider the risks from legionella that may affect their staff or others affected by its operations and to take suitable precautions to adequately control these risks.

This policy has been drawn up to set out the principles which will guide decisions and reduce as far as is reasonably practicable the risks from exposure to legionella bacteria.

The policy has been written in line with Health & Safety Commission Approved Code of Practice (ACoP) L8, Legionnaires' disease. The control of legionella bacteria in water systems and HSG 274 Technical guidance for the control of legionella bacteria.

This policy should be read in conjunction with the Legionella Guidance issued by Hertfordshire County Council, which the trust has adopted as key source of guidance.

3. Monitoring and review

This policy will be reviewed at intervals as appropriate, and at least annually. Revisions will be made to reflect organisational, technical, or legislative changes.

The termly health and safety audit will check compliance with the policy across the trust.

4. Roles and responsibilities

The board of trustees

The board's responsibilities are defined in the Corporate Health and Safety policy. This includes the ultimate responsibility for the trust's legionellosis risk management procedures.

Headteachers and local managers

The headteacher / local manager is nominated by the chief executive officer as being responsible for ensuring adequate systems are in place to control the risks from legionellosis on trust premises.

They are responsible for ensuring property facilities management, including planned, cyclical, reactive and emergency maintenance obligations are met by all parties for the premises under their control.

They must:

- Ensure adequate training is carried out in order staff have the required level of competency to perform their role.
- Understand the risks of exposure to Legionella bacteria; and know what action to take if a case of Legionnaires Disease is found or suspected.

- Inform the chief executive officer of any issues relating to their premises that may affect the risk assessment in premises under their control.

Site Managers

They are responsible for the day-to-day operation of premises and the health and safety of those who work or receive service at that location. Site managers are responsible for ensuring that this policy, in conjunction with the Legionella Guidance for Premises Managers' is complied with in their premises.

They must:

- Have available, and keep up to date, all information for the operation and management of their premises, including a copy of all the relevant records, schematic diagrams where available and risk assessments for the premises under their control.
- Monitor or arrange for the monitoring of water systems as detailed in the written control scheme (Appendix A) produced following a risk assessment.
- Understand the risks of exposure to legionella bacteria; and know what action to take if a case of Legionnaires Disease is found or suspected.
- Inform the headteacher / local manager of any issues relating to their premises that may affect the risk assessment in premises under their control. For example, in the event of temperature control falling significantly outside the required range or if temperature monitoring shows consistent failures.
- Ensure that if there is a change to the footprint and/or occupancy of a building and therefore a change in risk then a review of the existing water risk assessment must be carried out. It may be necessary to commission a new water risk assessment via a suitable provider.
- Co-operate and co-ordinate with other managers on shared premises.

All other employees

All employees have a duty not only for their own health and safety but also to co-operate with the trust in the implementation and maintenance of its arrangements to satisfy statutory duties for health and safety.

Employees therefore have a responsibility to:

- Understand the health risks associated with exposure to legionella bacteria.
- Report any health and safety concerns, defective equipment, or systems.
- Use water system in a safe manner according to HCC's Legionella guidance for premises managers
- Maintain records as required

5. Risk assessments

Where the trust has a direct responsibility for maintenance of water systems; and where there is a foreseeable risk of exposure to legionella bacteria, a legionella risk assessment will be instructed by the trust and will be completed by a competent specialist in line with ACoP L8 and considering the requirements of HSG 274.

Legionella risk assessments produced will include:

- A detailed assessment of the closed water system and susceptibility of those exposed.
- Recommendations for remedial works.
- A risk score.
- Site specific schematic drawings of the water system.
- CAD (Computer Aided Design) plans where available including relevant plant and marked sentinel outlets.
- Templates for recording training.
- Operational controls and frequencies for implementation.
- Premises log sheets for site managers to record operational checks.

- Lines of communication.

Risk assessments produced will enable a decision to be made on action required to control the risk of infection from legionella, they provide a point in time assessment of risk

6. Review of risk assessments

Individual premise risk assessments will not be reviewed at a set interval, such reviews will be risk based.

The risk of exposure to legionella bacteria will be reassessed in the following circumstances to determine to ascertain any further actions required.

- a significant change to a building's footprint
- a significant change to the water systems/ services; a change in use / occupancy of a building (this includes shutdown/ mothballing of premises)
- where existing controls are no longer effectively controlling risks e.g. in the event of temperature control falling significantly outside the required range or if temperature monitoring shows consistent failures. In the event of a reported outbreak or a high count of legionella bacteria.

In these cases, it may be necessary to commission a new water risk assessment via a suitable provider.

7. Control of risk of Legionellosis

The trust will adapt as far as is reasonably practicable the principles of control and management identified in ACOP L8.

The trust adopts temperature control as its primary control measure. Site managers are responsible for monitoring water temperatures and ensuring that all operational controls detailed in the accompanying guidance are implemented effectively i.e.

- Monthly temperature monitoring
- Weekly flushing of showers and infrequently used services

Individual risk assessments will identify a written scheme of precautions to be implemented specific to each premises to control that risk.

Legionella testing / sampling will not be conducted as a standard control except where a risk assessment identifies a specific property / occupancy as being at increased risk.

8. Notifiable plant

If at any time notifiable plant (e.g. cooling towers, evaporative condensers) is proposed for use, the trust will notify the relevant enforcing authority.

9. Training

Awareness training will be made available, this may be classroom or via the HCC I-Learn system. Training will include:

- What is Legionella and why is it harmful?
- The origins of Legionella and the factors which allow it to proliferate in manufactured water systems.
- Identification of the main conditions that need to coincide for Legionella infection to occur and how they may be used to control risk.
- Awareness of legal requirements, approved codes of practice and guidance.
- Legionella control regimes with monitoring programmes and records.

Site managers must ensure those delegated to carry out controls are competent to do so.

10. Record Keeping

Records of Legionella risk assessments, monitoring inspection, tests and checks must be maintained and managed under the control of the site manager, and retained for a period of at least 5 years.

The written scheme for controlling legionella and its implementation must be documented.

The scheme must include instructions on the operation of the system and details of the precautions to be taken to control the risk of exposure to Legionella bacteria, including checks and their frequency.

The recommended inspection frequencies will be based on Appendix 1 of the Health and Safety Commission Approved Code of Practice and Guidance L8: "Legionnaires disease - The control of Legionella bacteria in water systems". The Legionella guidance document details these in appendix 2.

Records of monitoring inspection, tests and checks must be maintained and managed under the control of the site manager, and retained for a period of at least 5 years

11. Shutdown / mothballing of premises

Where premises are left vacant then water services will be isolated. All water services and storage vessels will be drained and held dry. Storage vessels will be maintained in a sealed condition.

If it is not practicable to isolate water services within a vacant property, then weekly flushing of all outlets must be arranged. The legionella risk assessment will be reviewed, and advice sought from a competent specialist in line with ACoP L8.

Prior to recommissioning of water services, the system will be subject to a clean / disinfection.

Weekly flushing will continue until full occupation and hot water service subject to a thermal disinfection. The risk assessment will be reviewed prior to occupation to take account of the new occupancy.

12. Actions in the event of a reported high count and/or outbreak

In the event of a reported outbreak as defined in ACoP L8 the responsible person will inform the enforcing authority so as the case can be investigated.

In the event of a reported outbreak or where there is reason to believe there could be a high count of Legionella bacteria, samples will be taken by a competent person and analysed by a UKAS accredited laboratory to quantify the risk.

If samples are found to have counts above 100 the following actions will be taken.

- **More than 100 but less than 1000**

If only 1 or 2 samples are positive the system should be resampled within 7 days. If a similar count is found, a review of the control programme and risk assessment should be carried out and remedial actions identified. Changes should be implemented to avoid reoccurrence.

If majority of samples are positive the system may be colonised with Legionella. Consideration should be given to disinfection of the water system and an immediate review of the control programme and risk assessment should be carried out and remedial actions identified. Changes should be implemented to avoid reoccurrence.

- **More than 1000**

The water system should be disinfected either chemically or thermally.

The system should then be re-sampled within 7 days and an immediate review of the control programme and risk assessment should be carried out and remedial actions identified. Changes should be implemented to avoid reoccurrence.

13. Compliance monitoring and breaches

Employees must not act in any way that breaches this policy. Any policy breach is grounds for disciplinary action in accordance with the trust's Disciplinary Procedure. Policy breaches may also lead to criminal or civil proceedings.

APPENDIX A – WRITTEN CONTROL SCHEME

The written control scheme detailed below is based on recommendations within HCC Legionella Guidance and has been identified as the minimum level of monitoring that is required to control the risk, with consideration given to host susceptibility, building occupancy levels, system design & operation and historic monitoring records.

The monitoring actions must be undertaken by suitably trained and competent persons as defined in the fourth edition Approved Code of Practice during normal operation and use of the system. Records of all work undertaken must be kept for a minimum of 5 years in an appropriate format. Actions must be taken in accordance with written procedures when control measures do not meet the specified requirements. Where temporary changes of occupation or shutdowns of the system for maintenance occur, separate procedures must be established and followed. Where the previously identified remedial works have not been undertaken the following control measures may not be sufficient to control the risk of infection.

Service	Task	Frequency
Hot water Services	Where hot water is generated in a boiler room check that it stored above 60°C.	Daily
	Check temperatures in flow and return pipework to calorifiers (storage vessels). Thermostat should be set to store water at 60°C return temperature must be greater than 50°C	Monthly
	Appoint a competent contractor to visually check on internal surfaces of calorifiers for scale (via inspection hatch or borescope) clean by draining vessel to remove sludge and sediment. Where there is no inspection hatch purge any debris in the base of the calorifier. Colour of drain water may provide an indication of internal conditions.	Annually
Local point of use water heaters	Check water temperatures to confirm the heater stores water at 60°C and maintains it for one hour. Or for low storage volumes (under 15L) it operates at 50-60°C.	Quarterly or dependent on risk assessment
Hot and cold-water services	Check the water temperature of first and last outlets on a circulating system on each loop (the sentinel outlets) the location of which should be clearly identified in the sites water risk assessment. Hot water should reach 50°C within 1 minute after opening tap, where localised thermostatic mixing valves are fitted the temperature should be measured on the surface of the hot pipe prior to at the valve supply point with a contact thermometer. Cold water to be < 20°C within 2 minutes of running the cold tap. Take temperatures at a representative selection of other outlets to confirm compliance and create a temperature profile of the entire system.	Monthly
Cold Water tanks	Check that the tank water temperature at the point furthest away from the ball (float) valve and that the water flowing from the valve is below 20o C. Record the maximum temperatures of stored water via fixed max/ min thermometers	Annually (in the summer)
	Visually inspect cold-water tanks and carryout remedial works (clean and disinfect) where necessary, (lids sealed/lidded to prevent contamination)	Annually
Shower Outlets	Inspect and flush all showers for 2 minutes.	Weekly
Shower Heads	Inspect and dismantle, clean/disinfect, and descale showerheads and hoses.	Quarterly or more frequently as required.
TMV	Inspect, clean, descale and disinfect any strainers / filters (Ensure these are fitted only where needed to mitigate scalding risks)	Annually / manufacturers recommendation
Little used outlets, e.g. toilets, urinals, and wash hand basins.	Flush through directly to drain before use and without producing aerosols or water spray. Regularly use outlets to minimise risk of microbial growth.	Weekly or as indicated in the risk assessment

Spa baths	Check filters – sand filters should be back washed daily	Daily
	Check water treatment, pools should be continuously treated with an oxidising biocide	Three times daily
	Clean and disinfect entire system	Weekly
Spray Humidifiers, air washers and wet scrubbers	Clean and disinfect spray humidifiers/air washers and make up tanks including all wetted surfaces, descaling as necessary	Six monthly
	Confirm the operation of non-chemical water treatment (if present)	Weekly
Water Softeners	Clean and disinfect resin and brine tank – check with manufacturer what chemicals can be used to disinfect resin bed	Weekly
Sprinkler and hose reel systems	When witnessing tests of sprinkler blow-down and hose reels ensure that there is minimum risk of exposure to aerosols	As directed
Lathe and machine tool coolant systems	Clean and disinfect storage and distribution system	Six monthly
Horticultural misting systems	Clean and disinfect distribution pipework, spray heads, and make up tanks including all wetted surfaces, descaling as necessary	Quarterly or as indicated by risk assessment
Vehicle washes	Check filtration and treatment system, clean and disinfect system	See manufacturer's instructions
Fountains and water features	Clean and disinfect ponds, spray heads, and make up tanks including all wetted surfaces, descaling as necessary	Interval depending on condition.