

**FIVE RIVERS Multi Academy Trust**



**Five Rivers Multi Academy Trust  
Legionella Management Policy**

Policy start date: October 2018 JC

Reviewed: October 2021 JC – no substantive changes

Next review date: Oct 2023



## 1. INTRODUCTION

Legionella bacteria is found in both natural and treated water. Legionnaire's disease is an illness characterised mainly by pneumonia and is acquired by means of inhalation of small droplets carrying the bacteria.

Storing water in the 25-45 degrees Celsius range encourages the growth of legionella, hence attention must be given to ensuring that water is not stored within these limits, or that contact with water stored within these limits is eliminated as far as is reasonably practical.

Contaminated water presents the greatest risk when it is dispersed into the air as an aerosol. Legionella may be present in many water systems in very low concentrations but can be prevented from multiplying by careful risk management.

Five Rivers Multi Academy Trust acknowledges the health hazards associated with exposure to Legionella bacteria and will minimise exposure through the use of control measures and work methods in relation to the management of water systems as detailed in the Approved Code of Practice L8.

This policy should be read in conjunction with the Legionella Risk Assessment for each site.

## 2. AIMS

- The purpose of the policy is to set out how Five Rivers Multi Academy Trust will manage Legionella bacteria to reduce the risk of potential exposure as part of its duties under the Health & Safety at Work Act 1974.
- The policy is intended to ensure that Five Rivers Multi Academy Trust provides safe educational conditions for all pupils and safe working environments for all staff, visitors and contractors

## 3. LEGISLATION

The policy conforms to the following legislation and guidance which apply to the control of Legionella bacteria:

- Health & Safety at Work Act 1974
- Management of Health & Safety Regulations 1999
- Control of Substances Hazardous to Health Regulations (COSHH 2002)
- Approved Code of Practice L8 and Guidance HSG274.

In the event of an incident, as defined by the HSE, a Reporting of Injuries, Diseases and Dangerous Occurrence Regulation (RIDDOR) form will be completed and sent to the Health & Safety Executive (HSE) by the Head of Estates and Facilities.



## 4. RESPONSIBILITIES

### The Duty Holder

The Duty Holder has a responsibility to support this policy by ensuring the allocation of resources including an adequate budget, suitable and sufficient equipment, personnel, time and training.

In particular they will:

- Eliminate Risk where possible
- Appoint appropriate “Responsible Persons” to oversee, control and coordinate the control of the risk of legionellosis
- Ensure any appointed “Responsible Persons” have received appropriate training for their role
- Ensure that there are adequate resources are available to control the risk of legionellosis.

The Duty Holders for each academy are:

Tinsley Meadows Primary Academy- Deborah Sanderson - Principal

Abbeyfield Primary Academy – Helen Best – Principal

### The Responsible Person

The Responsible Persons have been given their authority by the Duty Holder. The position carries with it the authority to put into effect such measures as are required to control the risk of legionellosis. The Responsible Person has a duty to ensure that Document L8 and all relevant legislation associated with the management and control of legionellosis are adhered to, this includes ensuring that the scheme of precautions to control the risk of legionella is implemented and ensuring records are kept at all times.

In particular they will:

- Perform with integrity the given tasks that they have been trained to perform
- Maintain records as required
- Inform the Responsible Manager of any problems, discrepancies or anomalies
- Attend regular training to maintain the required level of competency to perform their given tasks



The Responsible Persons for the control of Legionella within each academy are:

Tinsley Meadows Primary Academy - Shannon Nolan - Caretaker

Abbeyfield Primary Academy – Jamie Clarke- Head of Estates and Facilities

## **Responsible Manager**

The Responsible Manager has been given their authority by the Duty Holder to act on their behalf to oversee the day to day management of Legionella control for Five Rivers Multi Academy Trust. The responsible manager has the responsibility for the day-to-day management including ensuring that the scheme of precautions to control the risk of legionellosis is implemented fully by competent persons.

In particular they will:

- Oversee the control and management of legionella on behalf of the Duty Holder
- Ensure that legionella risk assessments are carried out on behalf of the Duty Holder
- Eliminate risk where reasonably practicable
- Control risk where elimination is not reasonably practicable, by devising and implementing a scheme of precautions
- Arrange maintenance, monitoring and management of the precautions controlling the risk, including reviewing the risk assessment if there has been any material change and at intervals not exceeding two years
- Arrange the procurement of competent help, as required, including ensuring that the organisations and individuals deployed are competent and appropriately trained and experienced
- Ensure adequate record keeping takes place.

The Responsible Manager for Five Rivers Multi Academy Trust is:

Jamie Clarke- Head of Estates and Facilities



## 5. ASSESSMENT OF THE RISK OF LEGIONELLOSIS

The Responsible Manager will commission a risk assessment in line with **BS 8580:2010. Water quality. Risk assessments for Legionella control. Code of practice**. This will be undertaken by an appropriately competent contractor to assess the risk of legionellosis on all plant, equipment, facilities, and, as appropriate, work and work-related activities. This risk assessment shall provide the information required by the Responsible Manager, under the authority of the Duty Holder, to decide:

- Where the risk is negligible and likely to remain so
- Where the risk is significant but can be eliminated
- Where the risk is significant but can be controlled
- Where the risk is significant but cannot be controlled

**IF THE RISK ASSESSMENT IDENTIFIES SIGNIFICANT RISK OF LEGIONELLOSIS, WHICH CANNOT BE CONTROLLED, THE PLANT, EQUIPMENT, FACILITY, WORK OR WORK-RELATED ACTIVITY SHALL BE SUSPENDED UNTIL A SAFE MEANS OF OPERATION HAS BEEN DEvised AND IMPLEMENTED.**

The legionella risk assessment shall be carried out in a methodical and structured way in full adherence to **BS 8580:2010. Water quality. Risk assessments for Legionella control. Code of practice**. This will include consideration of the following:

- The likelihood of Legionella contamination at source, or on site;
- The conditions prevailing to take account of the likelihood of Legionella proliferating;
- Aerosol generation, dissemination and exposure; and
- The likely susceptibility of those exposed.
- A full schematic drawing of the water system.
- An asset list of all the water services

## 6. ELIMINATION OF THE RISK OF LEGIONELLOSIS

Where the risk assessment identifies a risk that is significant, all reasonably practicable (see HSE website for further definition reasonably practicable) measures shall be taken to eliminate that risk.

Reasonable practicability includes consideration of what is practicable (feasible) and, in relation to all actions that are practicable, whether they are reasonable when the quantum of the assessed risk is measured against the sacrifice (whether in money, time or trouble) involved in the feasible measures necessary to eliminate the risk.



## **7. CONTROL OF THE RISK OF LEGIONELLOSIS**

Where the risk assessment identifies a risk that is significant and it is either not practicable (not feasible) or practicable but not reasonable to eliminate that risk, a written scheme of precautions shall be devised and implemented to control that risk

### **Domestic Cold and Hot Water Systems**

#### **Risk**

The ideal growth temperature range for Legionella bacteria is 20-45°C. Temperatures between 20-45°C are not unusual in poorly managed or poorly specified water systems. The combination of the above temperature range with the presence of scale, debris and stagnation within a hot water system will result in Legionella growth.

#### **Control**

Five Rivers Multi Academy Trust adopts temperature control as its primary control measure, maintaining water temperatures and throughput, configuration and cleanliness so as to avoid conditions under which Legionella can proliferate. All water systems will be maintained to ensure that cold water temperatures below 20°C and hot temperatures above 50°C are supplied to outlets. All stored water will be maintained at temperatures of 60°C or above. Where temperature control cannot be maintained an engineering solution will be sought if this is not viable then alternative methods of control such as dosing with chlorine dioxide may be a suitable alternative.

Little used outlets are to be purged on a weekly basis with adequate records being kept.

#### **Legionella Testing**

Legionella sampling will be carried out where the usual control measures have failed and/or when we have had a previous test result returned as positive for the Legionella bacteria.

## **8. MANAGEMENT CONTROL**

The risk assessment, elimination of risk, devising and implementing the scheme of precautions and co-ordinating competent individuals for each aspect shall be effected by the Responsible Manager who will also be the keeper of the records generated on behalf of the Duty Holder.

#### **Training**

The Duty Holder will ensure that time and allocation of resources are provided to the Responsible Manager to keep up to date with all current legislation and recommendations of statutory responsibility



The Responsible Manager will ensure regular Legionella awareness-training takes place with all responsible personnel.

## 9. MONITORING AND REVIEW

Where the risk assessment identifies a risk, which is negligible and likely to remain so, that risk assessment shall be reviewed in two years.

Where the risk assessment identifies a risk which is significant and can be eliminated, that risk assessment shall be reviewed once the elimination has been effected.

Where the risk assessment identifies a risk, which is significant and can be controlled, that risk assessment shall be reviewed once the controls have been implemented or whenever there is a change, which may affect the risk.

Where elimination of a negligible risk is practicable (feasible) but not reasonable for reasons of cost, that reasonability study shall be reviewed whenever significant expenditure (such as for renovation) is considered.

Risk assessments, practicability studies and schemes of precautions where there is no reason to suppose there has been any relevant change shall be reviewed (but not necessarily repeated or redrafted) in two years.

## 10. EMERGENCY PROCEDURES

The following procedures are to be followed in the event of the following occurrences-

1. **Failing Temperature control:** Where it has been recorded that the temperature control for water systems have fallen outside the agreed parameters the Responsible Person will investigate and action. Where a one off fault has been identified and the rectification has resulted in the correct temperatures being achieved no further action will be taken. If temperature control consistently fails and the fault cannot be rectified the responsible person will report to the Responsible Manager. Legionella sampling will be instigated and maintained until the system fault can be rectified or until an approved alternative control measure has been implemented and shown to be working.
2. **Legionella Bacteria associated with a system:** Where a test for Legionella has been carried out and returned as positive for a premise then the responsible manager shall notify the Duty Holder immediately so they are aware. They will carry out a risk assessment of the building and its users to determine the next course of action which could be but not limited to, a complete flush through of the water system, pasteurization of the water system, chlorination of the water system, engineering solutions to remove potential problem to the system. Where a positive result has occurred sampling for the Legionella bacteria will continue until at least two clear samples have been received. The amount and intervals between the samples



will be as directed by the Responsible Manager following the risk assessment of the premises and its users

## **11. RECORD KEEPING**

The Responsible Manager (on behalf of the Duty Holder) shall keep appropriate records to confirm that the risk assessment; elimination or control of the risk has been effected fully by competent individuals. All records shall be signed by the person who carried out the work and dated.

## **12. PROCEDURE FOR PROJECTS**

All new water systems or modifications will be designed, constructed and installed in accordance with current legislation.

In order to ensure a consistent and compliant standard of delivery for all alterations to the trusts property portfolio, all projects that affect water services will be notified to the Responsible Manager. Works that constitute a material change to the water services/system will require a new Legionella risk assessment to be carried out as part of the project plan.

## **13. POLICY MONITORING AND REVIEW**

The Responsible Manager has overall responsibility for taking all reasonable steps to ensure that this policy is complied with and will conduct audits on a yearly basis to measure compliance on all Five Rivers Multi Academy Trust sites.

They will also issue a report on behalf of the Duty Holder to the Trustees and recommend actions in order to continue the development of the Risk Management Programme.

The policy will be formally reviewed and updated every two years by the Responsible Manager, or sooner if deemed appropriate, or by reasonable request.