Carwarden House School

Legionella Policy

Reviewed by SBM:	February 2025
Approved by AR&R Committee:	6th March 2025
Date of next review:	6th March 2027

Policy Template from Judicium Education Ltd

1. Statement of Intent

The *academy* is committed to providing a working environment, including water and engineering services provision, which is safe and without risks to the health, safety and welfare of its employees, students, contractors, and visitors. Employees of the academy, and contractor engaged to work on academy premises and water systems, plant and equipment must work with the employer to safeguard their own health, safety and welfare and bring to the employer's attention any situation they are aware of which could pose a risk to their health, safety, or welfare of that of their colleagues, students, or others.

The aims of this policy are to ensure that:

- The risks from the proliferation of legionella bacteria that may exist in our water systems are identified, controlled, and managed, in accordance with the HSE document L8, to ensure that staff, students, visitors, or passers-by are protected from the risks.
- The requirements of the Health and Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999 and HSE document L8 are complied with.
- Appropriately trained, technically competent and experienced staff are available and resourced to adequately manage water systems and associated legionella control.
- Appropriate risk assessments and safe working practices are identified and followed by all contractors and sub-contractors

The policy applies to all relevant school activities and is written in compliance with all current UK health and safety legislation and has been consulted with staff and their safety representatives (Trade Union and/or Health and Safety Representatives).

Name: Chris Hamilton **Signature:** _____

(Chair of Trustees)

Name: Tim Stokes **Signature:** _____

(Headteacher)

Date: 10th March 2025

Review Procedures
This Policy will be reviewed regularly and revised as necessary. Any amendments required to be made to the policy as a result of a review will be presented to the Board of Trustees for acceptance.

Document / revision no.	Date	Status / Amendment	Approved by

Distribution of copies
Copies of the policy and any amendments will be distributed to the Headteacher; Premises Manager; School Business Manager; All Staff; Trustees and Administration office.

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2. Roles and Responsibilities

2.1 Board of Trustees

2.1.1. The Board of Trustees have the overall responsibility for health and safety matters at the school and therefore acts as the Duty Holder for Legionella management. Responsibility for undertaking aspects of these duties listed below are delegated through management, (Headteacher /School Business Manager / Premises Manager)

2.1.2. Ensuring that a suitable and sufficient risk assessment is carried out to identify and assess the risk of exposure to Legionella bacteria from work activities and water systems under their remit

2.1.3. Ensuring that a written scheme is produced and implemented, where a reasonably foreseeable risk of exposure exists, for preventing or controlling the risks

2.1.4. Making sure that a Responsible Person is appointed to help the Duty Holder, (Board of Trustees), manage the day-to-day operational control procedures in accordance with the written scheme

2.1.5. Ensuring that steps are taken to check that equipment supplied for water systems are designed to minimise the growth of legionella bacteria and are installed in compliance with relevant water related regulations

2.1.6. Ensuring that persons working with water systems are appropriately supervised and have been provided with suitable information, instruction and training including the significant findings of risk assessments

2.1.7. Ensuring that the risk of Legionella is eliminated, where reasonably practicable, through improved engineering design of water systems, e.g. by removing dead legs or removing unused showers where water can stagnate

2.1.8. Ensuring that regular cleaning, treating, maintaining, and operating of water systems at predetermined intervals

2.1.9. Ensuring that regular monitoring, inspecting, testing, e.g. water temperatures and Legionella bacteria levels testing, and reviewing of the water system's control measures, risk assessments and the written scheme to ensure that management procedures are working effectively

2.1.10. Ensuring that the risks from scalding are minimised

2.1.11. Where relevant, ensuring that the requirements of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations, (RIDDOR), are complied with

2.1.12. Retaining records for 5 years, records kept must consist of the: -

- Appointed responsible people for conducting the risk assessment, managing, and implementing the written scheme
- Significant findings of the risk assessment
- Written scheme and its implementation
- State of operation of the water system, (working or not)

2.2 Headteacher

2.2.1. The Headteacher is empowered to ensure that legislative requirements are met; and that testing, maintenance or repairs are initiated as required. Such powers are supported by the necessary, sufficient, and appropriate resources, including funds

2.2.2. Executing the responsibilities of the 'Duty Holder', (Board of Trustees), on the behalf of the academy

2.2.3. Ensuring a 'Responsible Person' is appointed

2.2.4. Ensuring a policy on Legionella management is in place and complied with

2.2.5. Ensure adequate resources and competent staff are available to effectively manage water systems

2.2.6. Ensure water system monitoring and review takes place

2.2.7. Ensure communication and coordination is maintained between all parties who work on water systems, plant, and equipment, this includes academy employed staff, consultant advisors and contractor, when identified by key staff

2.2.8. Taking a lead role in a legionella outbreak situation

2.3 Health & Safety Lead (School Business Manager)

2.3.1. To undertake the role of 'Responsible Person' as defined in the HSE document L8

2.3.2. Ensuring the Legionella policy is communicated to staff and complied with

2.3.3. The identification and assessment of the risk programme for the prevention of the proliferation of Legionella bacteria in the academy water system and, with the assistance of a competent person, carry out a risk assessment, develop a written scheme and seek / implement advice on prevention and control procedures

2.3.4. Ensuring that academy employed staff and budget holders are made aware of their responsibilities in relation to water system design and maintenance

2.3.5. Ensure that safe working procedures are in place taking advice as necessary so compliance can be maintained

2.3.6. Regular monitoring and checking of water system procedures

2.3.7. Ensuring that a training programme is in place in consultation with the Duty Holder

2.3.8. Appointing the Premises Manager as deputy

2.3.9. Ensuring that any significant safety breaches are reported to the Duty Holder

2.3.10. Ensure records of checks and work completed, (as per the water management risk assessment / Legionella survey), are kept and readily available for inspection

2.4 Premises Manager

2.4.1. The day-to-day management on water systems, plant, and equipment and for Legionella reduction

2.4.2. Ensuring that all water system maintenance and alterations comply with HSE document L8 and other appropriate legislation

2.4.3. Ensuring that all water system maintenance and alterations comply with this policy and any associated procedures

2.4.4. Responsible for the coordination, inspection and monitoring of the water system on a monthly or a more regular basis if the need arises

2.4.5. Reporting to the Responsible Person any significant breaches immediately which need to be urgently rectified safely

2.4.6. Proactively resolving minor water system or legionella issues if competent to do so

2.4.7. Ensuring that appropriate records are maintained and updated, (internal and contractor checks), and that these are in line with the Legionella risk assessment findings

2.4.8. Ensuring that appropriate persons are competent and trained to work on water systems

2.4.9. Reporting any resourcing issues to the responsible person which are required so that legal compliance can be maintained

2.4.10. Acting as the deputy Responsible Person

2.5 All Staff

2.5.1. Cooperating with management arrangements for the control of Legionella in the workplace

2.5.2. Following any information, training and instruction given by the employer to prevent ill health

2.5.3. Reporting to the Responsible Person any disease diagnosed as Legionnaires Disease

2.5.4. Reporting to the Responsible Person any hazardous or dangerous situations

3. Arrangements

3.1 Legionella Description

3.1.1. Legionellosis is a collective term for those diseases caused by Legionella bacteria, including the most serious, Legionnaires disease as well as the less serious Pontiac fever and Lochgoilhead fever

3.1.2. Legionellosis can affect anyone who inhales small droplets of water, (aerosols), from water systems, e.g. showers that are contaminated with Legionella bacteria, however, principally affecting those who are susceptible due to age, illness, immune-suppression, smoking etc. and may be fatal. Legionella is widespread in natural sources of water

3.2 Risk Factors of Legionella

3.2.1. The presence of Legionella bacteria. The conditions that encourage Legionella bacteria to multiply include poorly maintained systems, ineffective control measures, presence of rust, sludge, scale etc. and water temperatures between 20 – 40 degree C

3.2.2. The means of creating and disseminating breathable aerosols, e.g. from spas, showers, taps, fire sprinkler systems, water jets, hose pipes, fountains and hot water systems etc.

3.2.3. The person. The disease / fever can affect anyone, however some people are at higher risk than others e.g. those people over 50, smokers, heavy drinkers, diabetics, those with respiratory problems and immune system impairments

3.3 Training Requirements

3.3.1. In order for appointed persons to fulfil their responsibilities set out in this policy effectively appropriate training must be offered by the academy and undertaken by the relevant persons

3.3.2. All relevant persons must undergo periodic refresher training in order to maintain awareness and knowledge required to fulfil their responsibilities set out in this policy

3.4 Operation and Maintenance

3.4.1. To prevent the growth of Legionella bacteria the water system shall operate at the following temperatures

- Cold water distribution and storage at 20 °C or below
- Hot water distribution at least 50 °C

- Hot water storage, (calorifiers), at 60 °C

3.4.2. Where there is a risk of scalding from taps at 50 °C, (e.g. to children or elderly), the use of thermostatically control mixing valves, (TMVs), should be used to allow water systems to run safely at higher temperatures

4. Conclusions

4.1 Effective management of water systems at the school/academy is recognised as critical in the prevention of ill health from Legionella bacteria

4.2 Regular maintenance and monitoring of water systems at the academy will ensure that the risks of Legionella bacteria are suitably controlled

4.3 The services of competent persons will be contracted, where required, for the assessment, monitoring, and management of risks associated with Legionella bacteria

Further Guidance

- HSE
  https://www.hse.gov.uk/
- HSE – Legionnaires' Disease. The Control of Legionella Bacteria in Water Systems. Approved Code of Practice L8
  https://www.hse.gov.uk/pubns/priced/l8.pdf
- HSE – Legionnaires' Disease: A Brief Guide for Duty-Holders
  https://www.hse.gov.uk/pubns/indg458.pdf
- HSE – Legionella and Legionnaires' Disease
  https://www.hse.gov.uk/legionnaires/index.htm
- NEU – Legionnaires Disease in Schools
  https://neu.org.uk/advice/legionnaires-disease-schools
- LCA – Legionella Control Association
  https://www.legionellacontrol.org.uk/