



Title Legionella Policy
Service Name Legionella and Water management procedure
Mrs Viv Hulme (Trust Estates, Facilities, and IT Infrastructure lead)
Category Health and Safety

Date April 2025
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Lacon Childe School legionella and water management policy

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1. Purpose

Lacon Childe School understands the dangers that Legionnaires Disease can pose to human life. We accept the duties and responsibilities passed on to us by Legislation in managing and protecting our workforce and others who may be affected by Legionella. It is for this reason the procedure aims to:

- Protect employees and others from exposure to legionella bacteria from water systems.
- Prevent the growth and cultivation of harmful bacteria through ensuring any water systems and assets are in good order, monitored, maintained and serviced as per required by legislation, recommendations and best practice.

Legionnaires' disease is a potentially fatal form of pneumonia caused by the inhalation of water droplets infected with the legionella bacteria. Legionella bacteria can occur naturally in lakes, rivers, etc. and in the water systems of buildings, such as schools. The bacteria thrive between temperatures of 20°C and 45°C; however, it can be killed by elevated temperatures or chemical treatment methods. This policy outlines how we aim to mitigate any risks involving legionella bacteria

Mrs Rachel Croxton-Broome is responsible for the day-to-day management of Legionella in Lacon Childe School.

2. Legal Framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Control of Substances Hazardous to Health Regulations 2002
- Safety Representatives and Safety Committees Regulations 1977
- Health and Safety (Consultation with Employees) Regulations 1996
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Notification of Cooling Towers and Evaporative Condensers Regulations 1992

This policy has due regard to the following good practice guidance:

- HSE (2013) 'Legionnaires' disease'
- HSE 'Leading Sensible health and safety management in schools'
- DfE (2022) 'Health and safety: responsibilities and duties for schools'

This policy operates in conjunction with the following Trust policies:



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3. Roles and responsibilities.

Duty holder (Mrs Rachel Croxton-Broome)

- Assumes overall responsibility for the strategy and resource allocation (within the limits of the approved budget) of financial and other resources for the control of legionella.
- Appoint in writing suitably competent Legionella Responsible Person(s) to undertake specific duties in regard to the operational management for the control of legionella.
- Provide the Responsible Person(s) with sufficient authority and support to ensure that all operational procedures are carried out in a timely and effective manner.

Legionella responsible person (LRP)

Mrs Viv Hulme is responsible for ensuring Lacon Childe School undertake suitable and sufficient legionella risk assessments and that these are reviewed every two years. Based on the risk assessment findings, produce and implement an effective management plan (scheme of control) to control legionella bacteria in the businesses hot and cold-water systems.

Appoint a competent contractor (Bradley Environmental) to assist with undertaking the legionella preventative maintenance and specialist remedial tasks. Also, to undertake water sampling.

- Ensure the LMP is brought to the attention of all stakeholders, is acted on and monitor the effectiveness of the plan.
- Produce an action plan to be implemented in the event of a legionella incident at Lacon Childe School and take a lead role in its implementation.
- Ensure that all persons with legionella responsibilities receive training that is appropriate to their level of responsibility.
- Undertake periodic monitoring e.g. contract review meetings of the Legionella Consultant and Legionella Contractor and assess performance against agreed key performance indicators (KPIs).
- Ensure that a robust system of records relating to the management system, scheme of control and training are created and kept to date
- Consult with and interact with any electronic waterlog books and or monitoring systems

Deputy legionella responsible person (DLRP) Martin Sherrey

- Assist the LRP in carrying out the above duties.
- Deputise for the LRP during absence.
- Consult with and interact with any electronic waterlog books and or monitoring systems

Directly employed maintenance staff (this may be the LRP/DLRP)

- Undertake any tasks allocated under the legionella preventative maintenance regime and ensure all results are logged.



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- Advise their immediate line manager of any defects or where monitoring/test results are outside of specified parameters.
- Attend legionella training.

Legionella consultant

- Undertake legionella risk assessments complete with schematic drawings of the hot and cold-water systems on the school site and forward copies to the LRP.
- Provide expert witness and consultancy services as and when requested by the LRP / DLRP.
- As per the contract specification, undertake periodic monitoring of the legionella management system and controls and report the results to the LRP.
- Consult with and interact with any electronic waterlog books and or monitoring systems

Legionella contractor/Site Team Member responsible for Compliance

- Undertake tasks allocated under the legionella preventative maintenance regime and/or the contract technical specification and ensure all results are logged.
- Ensure sufficient resources are available to perform tasks in accordance with this LMP and the contract.
- Notify the LRP / DLRP of any remedial works or test results that fall outside of established parameters e.g. elevated temperatures or a high TVC count.
- Maintain any up-to-date electronic waterlog books and monitoring systems. These are held on Parago under School name, Compliance, Legionella Testing and are tested monthly along with a log of the flushing of low use taps and holiday flushing.

4. Risk assessment

It is essential that the risk of legionella in all areas of Lacon Childe School water systems is considered and suitably assessed in order that effective controls can be identified and implemented. The risk assessment process will identify risks associated with legionella for all areas of the business where staff, contractors, visitors and members of the public have direct contact with water systems and outlets.

Lacon Childe School shall manage the risk assessment process in the following way:

- The LRP will appoint an external consultant (Bradley Environmental) who has membership of the Legionella Control Association or equivalent.
- A risk assessment shall be undertaken for each building, to include all water systems present and shall be carried out in accordance with the requirements of the Approved Code of Practice (ACOP) L81 and British Standard BS 8580:20102
- A written scheme is produced for each building to manage the risks.
- Risk assessments shall be reviewed at a maximum interval of two years and/or in the following;
 - a) Significant changes in legislation, guidance, technology and best practices.
 - b) Significant alterations to the water system(s).
 - c) Significant changes in building population or use.
 - d) Where sampling results indicate control measures are not effective
 - e) Where advised by the Legionella Consultant



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4.1 By understanding the systems and equipment outlined above, the competent person will ensure that any associated risks from exposure to legionella are identified. The school will establish whether:

- The water temperature in all or some parts of the system are between 20°C and 45°C. • Water is stored or re-circulated as part of the system.
- There are sources of rust, sludge, scale, organic matter and biofilms.
- The conditions are likely to encourage bacteria to multiply.
- It is possible for water droplets to be produced and, if so, whether they can be dispersed over a wide area, e.g. showers and aerosols from cooling towers.
- It is likely that any of the school's community are more susceptible to infection due to age, illness or a weakened immune system, and whether they could be exposed to any contaminated water droplets

4.2 The risk assessment will include the following:

- Management responsibilities, including the name of the competent person and a description of the water system installed
- Details of the competence and training of all key personnel
- Any identified potential risk sources
- Any controls in place to mitigate these risks
- Monitoring inspections and maintenance procedures
- Records of the monitoring results and inspections and checks carried out
- Arrangements to review the risk assessment annually, particularly when there is reason to suspect it is no longer valid.

4.3 When undertaking the risk assessment, if the competent person deems that the risks are low and are being properly managed in accordance with the law, the assessment will be considered complete.

4.4 The risk assessment will be reviewed annually, following any known changes to the system or when a concern over the system has been raised.

4.5 The risk assessment will identify and evaluate potential sources of risk and:

- How the risks of exposure to legionella will be prevented.
- If prevention is not reasonably practicable, how the risk of exposure will be controlled.



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5 Record keeping

Lacon Childe School shall adopt a rigorous methodology for the recording of information regarding the identification and assessment of the risk from legionella bacteria and for the implementation of control measures to reduce the risk from legionella.

These records should be retained throughout the period in which they are current and for at least two years afterwards. Records of any monitoring inspection, test or check carried out, and the dates, shall be retained for at least five years.

The legionella risk assessments shall be in an electronic and hard copy format.

All legionella preventative maintenance tasks and remedial works, whether undertaken by Lacon Childe School staff or the Legionella Contractor shall be undertaken against a work order generated by the school.

Training records for school staff e.g. admin teams, cleaning teams, Estates team etc. shall be held online and in the main office.

Certificates indicating contractor competence e.g. membership of the Legionella Control Association and records of the competency of the contractor's operatives are retained by Mrs Viv Hulme (Trust Estates Lead)

6 Training and competency

Only competent persons (as defined in ACOP L8) will be authorised to undertake legionella works. Therefore, all directly employed persons with legionella responsibilities and duties shall receive training to ensure they are competent to undertake their respective roles.

Attendance at training sessions will be recorded and retained for inspection.

Competency and the responsibilities for third parties such as contractors and their operatives shall be defined in the contract specification documents.

7 Communication

The Legionella Procedure will be made available to all staff.

Where required a copy of the LMP shall be issued to all relevant stakeholders - e.g. external contractors.

8 Audit and review

On a regular basis the school shall, with assistance from the Legionella Consultant, undertake an independent review of all legionella documentation.



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Lacon Childe School shall undertake regular monitoring of the legionella control systems to ensure they are being effectively implemented.

9 Design considerations for waterways

A primary method to prevent the growth of legionella bacteria in water systems shall be that all systems shall be designed in accordance with all relevant and current Building Regulations, British Standards, guidelines and best practices. All systems shall be designed to:

- Eliminate or minimise the production of aerosols.
- Eliminate low turnover of stored water through correctly sized storage tanks.
- Eliminate dead legs
- Be easily drained and accessible for maintenance activities.

All materials used in the construction of water systems shall comply with the requirements of the Water Supply (Water Fittings) Regulations 1993. Materials and fittings that are acceptable for use in the water system are listed in the directory published by the Water Research Centre.

10 Prevention, control and monitoring

The risk from exposure will be controlled by measures which do not allow the proliferation of legionella bacteria in the system and reduce exposure to water droplets and aerosols. Precautions will include the following:

- **Ensure the release of water spray is sufficiently controlled;**
- Avoiding water temperatures and conditions that favour the proliferation of legionella bacteria and other micro-organisms;
- Where hot water temperatures are kept below 43 degrees Celsius to avoid scalding, TMVs should be employed close to outlets to maintain safe temperatures in the pipes.
- **Ensure water cannot stagnate anywhere in the system by keeping pipe lengths as short as possible or removing redundant pipework;**
- Avoiding the use of materials that harbour bacteria and other microorganisms, or provide nutrients for microbial growth;
- Maintaining the cleanliness of the system and the water in it.
- All water outlets should be flushed through or used at least once a week.
- Routine flushing of all water systems will be in place throughout school shut down periods (School holidays).
- Use of water-treatment techniques if water temperatures cannot be maintained.
- Actions to ensure the correct and safe operation and maintenance of the system.



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- Keep records of control measures and other actions taken, such as maintenance or repair work.

The frequency of the legionella preventative maintenance tasks shall be dictated by the risk assessments and/or the recommendations of HSG274 Part 24. This document details the preventative maintenance the business should be currently undertaking on the hot and cold-water systems.

In addition to the above preventative maintenance control measures, monitoring of the water quality will be undertaken and shall consist of periodic water sampling and analysis for general bacteria (e.g. total viable colony count), which provide an indication of the water quality. Sampling and testing for the presence of legionella bacteria in the water shall also be undertaken.

Sampling for both microbiological quality and legionella bacteria shall be undertaken by the Legionella Contractor and the frequency and location of sampling shall be as per the contract specification and/or as requested by the LRP / DLRP.

Analysis of water samples for all TVC counts and legionella bacteria shall be carried out by a United Kingdom Accredited Services (UKAS) registered laboratory which takes part in the Public Health Laboratory Services (PHLS) 'Water Microbiology External Quality Assessment Scheme for the Isolation of Legionella from Water'.

Samples will be taken, stored and transported to the laboratory for analysis in accordance with BS 7592:20085

11 Legionella outbreaks

General

- An outbreak is defined as two or more cases where the onset of illness is closely linked in time (weeks rather than months) and where there is epidemiological evidence of a common source of infection, with or without microbiological evidence.
- Any suspected outbreaks should be reported immediately to your local Health Protection team.
- The local authority will convene an incident/outbreak control team to investigate outbreaks, whose purpose is to protect public health and prevent further infection. If the source of the infection is suspected to have originated from the hot & cold-water systems within Lacon Childe School the CCDC or Environmental Health Officer acting on behalf may make a site visit along with representative from the Health & Safety Executive (HSE).



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- Where any staff members are involved as a result of uncontrolled exposure to aerosols of water known to be harbouring the legionella bacteria, their management shall arrange referral to Occupational Health for assessment and monitoring. Staff shall be advised to seek medical advice from their GP if they are showing symptoms of legionnaire's disease – mild headaches, chills, tiredness, high temperature etc.
- If a member of staff has a positive diagnosis of Legionnaires disease, which has been contracted whilst at work, this will be notifiable under RIDDOR 2013.

12 Notification of an outbreak

Notification of an outbreak will be from an external agency and to undertake the management of an outbreak, the LRP / DLRP shall request the assistance of one or more of the following:

- The Legionella Duty Holder
- The Legionella Consultant
- The Legionella Contractor (maybe the same person as the Legionella Consultant)
- Shropshire Council
- **The Board of Trustees will be informed as soon as an outbreak is confirmed**

Lacon Childe School will co-operate fully with the external investigation team, and this may for example require:

- Tracing of all pipework runs.
- Provide operational records relating to maintenance.
- Providing statements from school staff
- Providing statements from the Legionella Consultant and Legionella Contractor
- Also, as part of an outbreak investigation the organisation may be instructed by the enforcing authority to take some or all of the following actions:
- Shut down any processes that can generate and disseminate airborne water droplets and keep them shut down until sampling procedures and any remedial has been completed.
- Before any emergency disinfection is undertaken, take water samples, as directed by the enforcing authority.
- Take water samples after chemical disinfection of infected system(s).
- Review staff health records to assess whether there have been any previous undiagnosed cases of illness that may be due to exposure to legionella bacteria and to help prepare case histories of the persons infected.

During the outbreak investigation the LRP / DLRP shall maintain a written log of all decisions made and actions undertaken, including by whom.

The outbreak incident will only be deemed to be over when advised by the HSE.



Shropshire
Gateway
Educational Trust

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13 Scheme of control

Unless otherwise advised the school shall adopt the scheme of control advised by the Legionella Consultant.