Control of Legionella Policy

November 2023

Signed (Chair):	Name: D Whinham	Date: 16.11.2023
Signed (Head):	Name: T Serle	Date: 16.11.2023
Reviewed by: C Goss/I Taylor	Reviewed on: 09.11.23	Note of Revisions: Adopted from LA Update made to water heater temperatures. All water heaters below 15 litres now set at 50°C instead of 55°C as recommended by Airmec
Ratified by: Governing Body on 16.11.23		Next Review: November 2024

Equality Impact Assessment (EIA) Part 1: EIA Screening

Policies, Procedures or Practices	Legionella	Date	09.11.23
EIA CARRIED OUT BY:	T Serle	EIA APPROVED BY:	T Serle

Groups that may be affected:

Are there any concerns that the policy could have a different impact on any of the following groups? (please tick the relevant boxes)	Existing or potential adverse impact	Existing or potential for positive impact
Age (young people, the elderly: issues surrounding protection and welfare, recruitment, training, pay, promotion)		X
Disability (physical and mental disability, learning difficulties; issues surrounding access to buildings, curriculum and communication).		X
Gender Reassignment (transsexual)		X
Marriage and civil partnership		X
Pregnancy and maternity		X
Racial Groups (consider: language, culture, ethnicity including gypsy/traveller groups and asylum seekers		X
Religion or belief (practices of worship, religious or cultural observance, including non-belief)		X
Gender (male, female)		X
Sexual orientation (gay, lesbian, bisexual; actual or perceived)		X

Any adverse impacts are explored in a Full Impact Assessment.

This policy sets out the control of Legionella in hot and cold water systems in the school, including responsibilities, training, testing and records.

1. POLICY STATEMENT

The School will undertake to ensure compliance with the relevant legislation with regard to the Control of Legionella in hot and cold water systems for all pupils and employees and to ensure best practice by extending the arrangements as far as is reasonably practicable to others who may also be affected by our activities.

2. **DEFINITIONS**

Legionella is a generic term for a type of bacteria which is common in natural and artificial water systems. Legionellosis is the name given to a group of pneumonia-like illnesses caused by Legionella. The bacteria thrive at temperatures between 20°c and 45°c but can be killed by elevated temperatures or chemical treatment.

3. MANAGEMENT - See Appendix 1

4. GENERAL INFORMATION

The School stores hot water in all water heaters above 15 litres at 60°C and in all water heaters below 15 litres at 50°C. Children are protected from scalding by controlling the delivery temperature of hot water from a tap to 43°C by the use of thermostatic mixing valves. These are found in all of the toilet areas, the kitchen and the hall kitchen. Regular checks are made to ensure that the valves are working correctly. There are a number of water outlets that do not have thermostatic mixing valves – these are found in the cleaners store, male and female toilets and the staff room. All these outlets have a warning sign.

5. **RISK ASSESSMENT**

Assessment of risk is mostly confined to:

- Monitoring whether control measures are being instigated fully.
- Correct water temperatures are being maintained.
- Maintenance measures, such as temperature control valves, are working properly.
- Monitoring the COSHH requirement of eliminating the risk ahead of control measures (eg removal of any unused pipework, showers etc)

Any failures must be reported immediately to the Headteacher.

6. CONTROL MEASURES

a. To achieve ongoing control of legionella, thorough flushing of the water system is required alongside any maintenance controls.

b. Effective control measures will require the school to:

- Monitor any water outlets that are not in regular use.
- Record the flushing of all water outlets.
- Record the temperature of hot and cold water outlets.
- Record the TMV outlet temperatures to ensure they are working.
- Ensure contactors only use WRAS approved materials on the buildings water system.
- We acknowledge the COSHH principle of removing risk ahead of management of the risk where possible.

c. Full details of flushing and testing regimes that need to be carried out can be found in Appendix 2.

7. TESTING ARRANGEMENTS

a. Under certain circumstances, for example, when there have been alterations or maintenance work to the water system, testing is to be carried out in accordance with Appendix 2.

b. Disinfection of the system will be necessary when testing indicates there is a sufficient level of legionella present in the water system to require treatment - see Appendix 3.

8. INFORMATION, INSTRUCTION & TRAINING

a. The Headteacher will ensure that suitable and sufficient training and information is given the School Caretaker, and any other member of staff, who has responsibilities for flushing, record keeping and taking temperature readings as required by the appendices.

b. Any new measures that are introduced to control legionella will need appropriate training provision.

APPENDIX 1 Duty Holders
APPENDIX 2 Procedure for Flushing and Temperature Testing.
APPENDIX 3 Procedure for Disinfection.
APPENDIX 4 Procedure for Flushing Showerheads (to be issued if showers are installed).

APPENDIX 1

Legionella Management

Name of person with specific responsibility	Area of responsibility
Duty Holder Tracy Serle Headteacher	He or she has overall responsibility for putting into practice procedures that cover operating, maintaining and testing water supplies. He or she may pass on the matters listed below, but not the overall responsibility. - Produce and keep up-to-date schematic drawings of all water systems. - Ensure that a formal audit the system in place at least once a year to make sure control measures is being adhered to. - Carry out a risk assessment and produce an action plan of measures to put things right where necessary. - Make sure that all relevant staff are trained in the requirements of the policy and all operating procedures. - Ensure that flushing and testing of water outlets is carried out in accordance with Appendix 2 - The approved contractors are informed of any problems with the water or the water system. - Monitor disinfection procedures where necessary – see Appendix 3.
Responsible Person Name: Stewart McSmythurs	He or she will act as the responsible person if the duty holder is absent.
Deputy Responsible Person (1) Name: Ian Taylor – Caretaker (BHJS)	He or she will act as the responsible person if the duty holder and the responsible person is absent.
Deputy Responsible Person (2)	

Name: Wayne Edbrooke - Caretaker (BHIS)	He or she will act as the responsible person if the duty holder and the responsible person is absent.
Health & Safety Governor Name: Donna Whinham	To annually check the log book to ensure that control measures are being carried out regularly.
Competent person (Contracted Risk Assessment) Name: Airmec Tel: 01454 275050	He or she will do the following. - Advise on the possible areas of risk and identify where systems do not meet current guidance. - Advise on the necessary controls and procedures for preventing legionella. - Monitor how those controls and procedures are put into practice and how efficient they are. - Help the nominated manager in developing maintenance procedures. - Tell the nominated manager about any problems in the legionella control system. - Produce a report of inspections, maintenance, disinfection, cleaning, shutdowns and so on. - Arrange and carry out, where appropriate, all necessary sampling (for example, microbiological sampling, chemical tests, biocide levels, and pH and temperature measurement). - Review all water test results when they receive them and, where necessary, take appropriate action to put things right in line with the operational procedures for controlling legionella.
Maintenance Contractor Name: EJ Heating 0117 9653703	- Responsible for hot water system - Annual Maintenance to include cleaning and flushing through of hot water system.
Caretaker Name: Ian Taylor	He or she will do the following. - Produce and maintain a list of all location points that must flush out hot-water outlets every week. - Record the flushing of all water outlets - Make sure that all taps, outlets and associated pipework that are not needed are removed.

	- Maintain weekly temperature charts of flow and return of hot- and cold-water systems.(completed by Wayne Edbrooke (BHIS))

APPENDIX 2

FLUSHING AND TEMPERATURE TESTING PROCEDURES
1. FLUSHING

a. All water outlets (hot & cold) will be flushed through weekly (but see para c below) and a record will be kept in writing on the water outlet flushing checklist by the person carrying out the flushing.

b. Flushing will last for at least two minutes at a reasonable flow rate.

c. 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.

2. TEMPERATURE TESTING

a. A 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 at least two minutes every month so that a temperature can be taken using a thermometer and recorded on the Water Temperature Check List.

b. The cold water outlet temperature should be below 20°c after two minutes running.

c. The hot water outlet temperature should be above 50°c after one-minute running,

d. If these temperatures cannot be achieved then the Headteacher is to be informed.

e. Check the calorifier temperatures. Flow 60°c and return at 50°c– monthly and record

f. The TMV temperatures should be working with the correct parameters between 35 & 39 degrees for the children's facilities and between 41 and 46 degrees for staff facilities. Action will be taken to service or replace any TMV failing the check.

g. Further investigation may be required when there appears to be a problem with the water supply, e.g. discolouring, temperature problems, etc. These should be reported to the Headteacher.

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

APPENDIX 3

PROCEDURE FOR DISINFECTION

a. If the school produces a sufficiently high result after testing, it will be disinfected by an approved contractor. South Gloucestershire Council will be informed.

b. The Headteacher will arrange the time and date of disinfection with the selected contractor.

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

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

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

f. Alternative hand cleaning methods will be instigated to supplement the wearing of protective gloves for personal care. (eg. Hibiscrub & antiseptic wipes).

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

h. Disinfected areas will be re-instated immediately after completion of the disinfection process and the flushing regime will recommence.

APPENDIX 4

PROCEDURE FOR FLUSHING SHOWERHEADS

The only shower head on the junior site is the pot wash in the kitchen

This should be dismantled and de-scaled every 3 months. This task is completed by Wayne Edbrooke (Caretaker BHIS)