

# Paxcroft Primary School

## Legionella Policy

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This policy sets out Paxcroft Primary School's (The School's) approach to managing significant legionella risks associated with water systems. This policy applies to any use or storage of hot and/or cold water that is owned, managed, maintained or controlled, to any extent, by The School that could result in the formation and/or transmission of water droplets (aerosols) which may be inhaled by any person, thereby creating a reasonably foreseeable risk of exposure to legionella bacteria.

This policy should be read in conjunction with The Health & Safety Executive (HSE) Technical Guidance document [HSG274 Legionnaires' disease: technical guidance](#) which identifies how actions should be carried out in order to comply with legislation.

## 1. Statement of intent

The School is committed to reducing, so far as is reasonably practicable, any foreseeable risks of exposure of any person to legionella bacteria. The School will aim to achieve this policy commitment by following the principles set out in the HSE publication [Legionnaires' disease: the control of legionella bacteria in water systems](#).

The HSE [Approved code of practice and guidance L8 4<sup>th</sup> edition](#) explains the necessary steps to comply with legislation. This will include:

- Appointing one or more Responsible Persons to have responsibility for managing identified in-scope water use and storage systems.
- Carrying out a suitable and sufficient risk assessment of all work activities and in-scope water systems to identify and evaluate foreseeable risks of exposure to legionella bacteria.
- Identification of any particular "at risk" groups of people who may be at greater risk of harm if exposed to legionella bacteria.
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- Recording the significant findings of each such assessment.
- Producing and implementing written arrangements (a legionella management plan) to avoid, so far as is reasonably practicable, exposure to legionella bacteria. Where it is not possible to avoid this risk then the plan will identify the measures for controlling the risk of such exposure and to ensure that such controls remain effective.
- Keeping appropriate records of any management and any associated monitoring activities.
- Allocating sufficient resource to ensure that reasonably foreseeable risks of exposure to legionella bacteria are managed. This will include the appointment of suitable numbers of competent people to advise on legionella management matters and to assist with the development and implementation of the legionella management plan.
- Providing suitable and sufficient information, instruction, training and supervision to relevant employees to enable them to perform their duties under this policy and any associated procedures and to reduce the risk of legionella growth and transmission and foreseeable exposure of any person to legionella bacteria.
- Ensuring that all new water systems are designed, specified, installed and commissioned so as to avoid, where reasonably practicable, the foreseeable exposure of people to legionella bacteria or, where avoidance is not practicable, to ensure that such risks are reduced to a tolerable level.
- Carrying out a legionella risk assessment on all new buildings following handover from the Principal Contractor. The assessment findings will be incorporated into the building's legionella management plan.
- Managing all works on existing domestic hot and cold water systems to ensure that foreseeable risks of legionella exposure are managed.
- Ensuring that all work on domestic hot and cold water systems are only carried out by suitably competent people.
- Undertaking periodic audits to ensure that all relevant duties under this policy and applicable legislation are being managed effectively.



## 2. Relevant Legislation & Guidance

### 2.1 Legislation Guidance

- [The Health and Safety at Work Act etc. 1974](#)
- [The Management of Health and Safety at Work Regulations 1999](#)
- [The Control of Substances Hazardous to Health Regulations 2002](#)
- [The Construction \(Design and Management\) Regulations 2015.](#)
- [Legionnaires' disease. The control of legionella bacteria in water systems. Approved Code of Practice and guidance L8 \(Fourth Edition\). Health and Safety Executive \(HSE\).](#)

### 2.2 Guidance

- [Technical Guidance HSG274](#)



### 3. Definitions

The HSE identify that the following water use and storage systems each present a reasonably foreseeable risk of exposure to legionella bacteria.

Cooling systems with cooling towers, evaporative condensers or dry/wet cooling systems; hot and cold water systems; spa baths; other plant and systems containing or using water, or water-based solutions, where any or all of the following apply:

- The water temperature in all or some parts of the system may be between 20–45 °C, which is suitable for legionella bacterium growth.
- There is a means for creating and spreading breathable droplets (aerosols).
- Water is stored and/or re-circulated
- There are deposits that can support bacterial growth, such as rust, sludge, scale, organic matter and biofilms.
- Domestic hot and cold water Systems
- Water systems that are considered to be an inherent part of a building's services. Examples (this list is not definitive) could include general hot and cold water supplies, wet heating systems, sanitary water supplies, emergency drench showers, Point of Use Water Heaters directly connected to either the mains water supply or a mains-fed water storage system, building sprinkler systems, hydrants, fire hoses and mains-fed water fountains.



#### 4. School equipment

Any specialist water systems or equipment that is independent of a building's water supply. Examples include but are not limited to:

- Stand-alone water / wave tanks
- Rain water harvesting systems
- Water baths
- Humidifiers
- Re-circulating water vacuum systems
- Horticultural watering and misting systems
- Washing machines with sumps
- Coolant used with engineering and other experimental equipment
- Hoses and spray heads



## 5. Roles & responsibilities

The School Business Manager is the dutyholder and has the authorised overall day-to-day responsibility for health and safety matters at The School and therefore legionella management. The dutyholder has appointed The School's Site Manager to the position of Responsible Person.

### 5.1 Dutyholder: School Business Manager

The dutyholder shall oversee and be ultimately responsible for the management and control of legionellosis within all premises owned and occupied by The School

In the event of an outbreak or of the reporting of elevated results, the Dutyholder shall undertake to put in place the arrangements as per the outbreak and elevated results procedure.

It will be the responsibility of the Dutyholder oversee any necessary remedial actions highlighted in the results of any legionella risk assessment carried out at The School and to maintain all records associated to the Management and Control of Legionellosis for a period of 5 years and archive records for a period of 15 years.

In the absence of the Dutyholder due to holiday or illness or any other reason, the Responsible Person shall undertake the duties of the Dutyholder until such time that the Dutyholder may be present to undertake such duties.

### 5.1 Responsible Person: Site Manager

The Responsible Person has responsibility for the day-to-day operation of the scheme of precautions and management and control of Legionellosis.

The Responsible Person shall be suitably informed and competent to ensure that the control measures will be undertaken in a safe and technically competent manner.

The Responsible Person has authority to delegate responsibility for undertaking aspects of these duties through the instruction of external contractors and/or service providers. They shall also have sufficient authority to authorise necessary precautions in the event of an emergency or for planned works.

In the absence of the Responsible Person due to holiday or illness or any other reason, the dutyholder shall undertake the duties of the Responsible Person until such time that the Responsible Person may be present to undertake such duties.



## 6. External contractors & service providers

It is the responsibility of all external contractors & service providers instructed to carry out work on site to ensure that all goods and services be provided fit for purpose, provided in a timely manner and to act in accordance with all relevant legislation and guidance on the management and control of legionellosis at The School.

Among other services, the delegation of management and control of legionellosis is permitted to be delegated to external contractors & service providers and an external company may be appointed to develop and provide a legionella management plan. Overall responsibility cannot be delegated.

It is the responsibility of all external contractors & service providers to undertake all tasks assigned to them and ensure that records of all maintenance in connection to the management and control of legionellosis.

External contractors & service providers shall liaise closely with the Dutyholder and/or Responsible Person to ensure continued compliance to the regulations.



## 7. Legionella Management Plan

A bespoke Legionella Management Plan is developed for each system by a suitably competent person. This may be an external contractor or service provider. The legionella management plan will include:

- An appropriate schematic detailing the water system and its key components.
- A written record of the system risk assessment. This will include consideration of any “at risk” groups who might potentially be exposed to legionella bacteria.
- A written schedule for minimising the risk of legionella within each system. This will include a prioritised action plan and a mechanism for escalating remedial work where the risk assessment, or any subsequent monitoring regime, identifies a significant risk of legionella growth or transmission.
- A written schedule and procedures for inspection, maintenance and disinfection, where applicable, of each system.
- A written schedule for monitoring the effectiveness of control measures for each system
- All relevant staff are made aware of any control measures identified in the Legionella Management Plan that they may be responsible for implementing (for example, the periodic flushing through of certain outlets).

The Legionella Management Plan is subject to annual review alongside this policy.

System risk assessments are reviewed at a maximum of two-year frequency.

Appropriate actions are taken to remediate any matters arising from system inspections, testing and monitoring.

Significant non-conformances are reported to the Dutyholder as soon as is reasonably practicable.

People working on in-scope systems are competent to do so and comply with this policy and all other relevant water hygiene and safety legislation

Suitable and sufficient information, training, supervision and instruction is given to any person authorised to work on in-scope systems.

Ensure that any control measures that they are responsible for implementing (for example, flushing through of certain local outlets) are carried out in accordance with the directions of the Legionella Management Plan.

Staff should alert the Dutyholder and/or Responsible Person to any redundant or little used hot and cold water outlets within their areas.

