



Legionella Policy

Approval of the Governing Body

This document is a statement of the aims, principles and strategies for:

Legionella

at Lugwardine Primary Academy

It has been agreed and is supported by the teaching staff and the governing body

Signatures

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Mrs C Long Chair of Governors



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Contents

Statement of intent.....	3
Legal framework	3
Roles and responsibilities	4
Identifying and assessing risks	5
Managing risks	6
Preventing risks.....	6
Record keeping	7
Incident reporting	8
Reporting procedure.....	8
Accident investigation.....	8
Implementing a control scheme	8
Monitoring and review	9

Statement of intent

Lugwardine Primary Academy understands its responsibility to assess, prevent and control any risks from harmful bacteria, like legionella, and to implement suitable precautions to ensure the health and safety of our staff, pupils and school community. To meet this duty, we have developed this policy, which outlines how the school will keep the entire school community safe from legionella.

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.

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 (2014) 'Sensible health and safety management in schools'**
- DfE (2018) 'Health and safety: responsibilities and duties for schools'

This policy operates in conjunction with the following school policies:

- Health and Safety Policy
- Control of Substances Hazardous to Health Regulations (COSHH) Policy
- Data Protection Policy
- Records Management Policy

Roles and responsibilities

The governing board, as the employer, is responsible for:

- Ensuring that the overall health and safety provision in the school is effective and sufficient.
- Identifying and assessing sources of risks relating to legionella, e.g. checking the water systems.
- Managing risks relating to legionella.
- Preventing and controlling any risks that arise following a legionella risk assessment.
- Keeping and maintaining up-to-date records of any legionella risks and the control measures implemented.
- Carrying out any other duties as required by health and safety legislation.

The headteacher is responsible for:

- The day-to-day development and implementation of safe working practices and conditions for all staff, pupils and visitors.
- Introducing management systems and practices that ensure risks are dealt with sensibly, responsibly and proportionately.
- Reviewing this policy and its effectiveness annually, in liaison with the competent person.
- Designating a competent person who is to be responsible for ensuring the school meets its health and safety duties, including in relation to legionella – the competent person will be the health and safety officer.

The School Business Manager (the health and safety officer) is responsible for:

- Assisting with the creation and implementation of this policy.
- Investigating accidents and incidents, understanding the causes and amending risk assessments as required.
- Being the designated contact with the LA and the HSE where necessary.
- Supporting staff with any queries or concerns regarding health and safety.

- Identifying hazards by conducting risk assessments.
- Implementing the specific measures needed to comply with the law, as outlined in this policy.
- Liaising with competent help when applying the provisions of health and safety law, e.g. external health and safety organisations.
- Reporting cases of legionnaires' disease to HSE, if necessary.
- Consulting with trade union representatives, other employee representatives, or employees where there are no representatives, regarding health and safety matters.
- Checking water temperatures during climatic changes.
- Monitoring the general bacterial numbers within water systems to ensure safe levels.
- Arranging expert microbiological sampling of water systems when elevated bacteria levels have been identified.
- Preparing a written scheme for preventing and controlling the risk of legionnaire's disease.
- Checking risks of contaminated water supplies.
- Checking systems for deposits of rust, sludge, scale or biofilms.

All staff are responsible for:

- Acting in accordance with this policy at all times.
- Reporting any concerns regarding legionella to the health and safety officer as soon as possible.
- Cooperating with their employers on health and safety matters.
- Carrying out their work in accordance with training and instructions.
- Familiarising themselves with the Health and Safety Policy and aspects of their work related to health and safety.
- Following the instructions of the health and safety officer.
- Ensuring the health and safety of pupils.

Identifying and assessing risks

The health and safety officer will conduct a risk assessment to identify and assess any risks regarding legionella. Where required, the health and safety officer will seek advice when conducting the risk assessment, e.g. from external consultancies.

The health and safety officer and site manager will understand, and ensure any other relevant staff understand, how to use the water systems, equipment associated with the systems (e.g. pumps), heat exchangers, showers, etc.

By understanding the systems and equipment outlined above, the health and safety officer and site manager 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.

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

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

Where the assessment is considered complete, the health and safety officer may deem that no further action is required; however, any existing control will be maintained and the assessment will be regularly reviewed, in case anything in the system changes.

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

If the risk assessment raises any concerns, the health and safety officer will inform the appropriate members of staff, e.g. the SBM, and control measures will be implemented.

Managing risks

The School Business Manager has been appointed as the health and safety officer and they have the authority, competence, understanding and skills to fulfil this role.

Where contractors are used to undertake water treatments, the competent person will ensure that the treatment meets all legal obligations.

Preventing risks

Following a risk assessment, the health and safety officer will consider whether the risk of legionella can be prevented by reviewing the type of water system that is installed and assess whether it is fit for purpose.

The school will ensure that the design, maintenance, and operation of water services are in a condition that prevents or controls the growth and multiplication of legionella.

If risks that cannot be prevented are identified, the health and safety officer will develop a written control scheme, which will help the school to manage the risk of legionella.

The control scheme will implement effective control measures by outlining the following:

- The water system, e.g. develop a schematic diagram
- Who is responsible for carrying out the assessment and managing its implementation
- The safe and correct operation of the system
- What control methods and other precautions will be used
- What checks will be carried out, and how often will they be carried out, to ensure the controls remain effective

To ensure the health and safety of the school community regarding preventing legionella, the school will:

- Ensure that the release of water spray is sufficiently controlled
- Avoid water temperatures and conditions that favour the growth of legionella and other microorganisms
- Ensure water cannot stagnate anywhere in the system by keeping pipe lengths as short as possible or removing redundant pipework
- Avoid materials that encourage the growth of legionella
- Keep the system and the water in it clean
- Treat water to either control the growth of legionella (and other microorganisms) or limit their ability to grow
- Monitor any control measures applied
- Keep records of control measures and other actions taken, such as maintenance or repair work

The school will consult with employees or their representatives on the identified risks and the measures and actions that will be taken to prevent and control the risks.

Record keeping

The health and safety officer will maintain an up-to-date record of any significant legionella findings, including any individuals who are identified as being particularly at risk and the steps taken to prevent or control risks.

The school is required to keep records of the following:

- The person(s) responsible for conducting the risk assessment
- Any significant findings that were identified from the risk assessment
- Any written control scheme and details of its implementation
- Details of the state of operation of the system, i.e. in use or not
- Any results following monitoring inspections, including the dates of these

Records will be retained while they are in date, and for at least two years afterwards. Additionally, any records of monitoring inspections will be kept for at least five years.

In addition, the school keeps records of the following items:

- Names and positions of people, and their deputies, responsible for carrying out the various tasks under the written control scheme
- A risk assessment and a written scheme of actions and control measures
- Schematic diagrams of the water systems
- Details of precautionary measures that have been implemented including enough detail to show that they were implemented correctly, and the dates on which they were carried out

- Remedial work required and carried out, and the date of completion
- A log detailing visits by contractors, consultants and other personnel
- Cleaning and disinfecting procedures and associated reports and certificates
- Results of the chemical analysis of the water
- Results of any biological monitoring

Incident reporting

All incidents of legionella will be reported as soon as possible to the health and safety officer.

The health and safety officer will be responsible for informing the headteacher – the notification will cover:

- Details of the sample.
- The organism present in the sample.
- Location.
- Advice on appropriate remedial measures.

If a member of the school community is taken ill following exposure to legionella, the chair of governors will be notified immediately.

Reporting procedure

Should an incident require reporting, the health and safety officer, or a person appointed on their behalf, will file a report as soon as is reasonably possible.

The designated person will complete the relevant online form.

The school will notify the LA, in writing, if we have a cooling tower or evaporative condenser on site, and include details about where it is located. We will also inform the LA if/when such devices are no longer in use.

Accident investigation

All occurrences of legionella, however small, will be investigated by an appointed party and the outcomes recorded.

The length of time dedicated to each investigation will vary on the seriousness of the occurrence.

After an investigation takes place, a risk assessment will be carried out, or the existing risk assessment will be amended, to avoid reoccurrence.

Where appropriate, the health and safety officer will complete the relevant form as outlined in 8.2.

Implementing a control scheme

The health and safety officer will establish a written control scheme, where necessary.

The implementation of any written control scheme will be monitored by the health and safety officer.

The health and safety officer will supervise anyone involved in any related procedure of the written control scheme.

The health and safety officer will ensure all responsibilities are defined in the written control scheme and all staff understand these responsibilities.

Staff with any responsibilities within the written control scheme will have the necessary skills and experience needed to carry out their roles.

The health and safety officer will ensure that there is an appropriate number of staff available during all hours that the water system is operating – this will be established depending on the risks the water system poses.

The health and safety officer, or their deputies, will be contactable during all hours that the water system is in operation.

The school will be responsible for the health and safety of the school's community, regardless of if contractors are employed for any reason.

The school will not use water systems, parts of water systems or systems of work that lead to exposure of legionella.

The written control scheme will include details of the following:

- An up-to-date plan showing the layout of the plant or water system, including parts temporarily out of use (a schematic diagram is sufficient)
- A description of the correct and safe operation of the system
- The precautions that have been implemented
- Checks to carry out to ensure the written control scheme is effective and the frequency of such checks
- The remedial action to take if the written scheme is shown to be not effective

The written control scheme will give details on how to use and carry out the various control measures and water treatment regimes, e.g. health and safety information regarding storage.

The written control scheme will also provide details on the correct operation of the water system, including:

- Commissioning and recommissioning procedures.
- Shutdown procedures.
- Checks of warning systems and diagnostic systems in case of system malfunctions.
- Maintenance requirements and frequencies.
- Operating cycles – including when the system plant is in use and not.

Monitoring and review

This policy will be reviewed by the health and safety officer at least annually.

It is vital that the effectiveness of control measures is monitored and that decisions are made about when and how monitoring should take place. As such, to ensure the policy and control measures remain up-to-date, this policy will be reviewed when:

- There have been changes to the water system or its use.
- There have been changes to the use of the building in which the water system is installed.
- There is new information about risks or control measures available.
- The results of checks indicate that control measures are no longer effective.
- There are changes to key personnel.
- A case of legionnaires' disease/legionellosis associated with the system.

Any changes to this policy will be communicated to all members of staff, and parents, where necessary.