

**Three Counties Academy Trust**



# Legionella Health and Safety Policy

## #HS13

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**Subject to periodic amendment. To be reviewed in full no later than 26<sup>th</sup> February 2029**

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## Common abbreviations and acronyms

<b>AA</b>	Admissions Authority	<b>GPA</b>	Government Procurement Arrangement
<b>AAI</b>	Adrenaline Auto-Injector (Epi Pen)	<b>HASH</b>	Herefordshire Association of Secondary Heads
<b>ACM</b>	Asbestos Containing Materials	<b>HBV</b>	Honour Based Violence
<b>AFH</b>	Academies Financial Handbook	<b>HR</b>	Human Resources
<b>AHT</b>	Assistant Headteacher	<b>H&amp;S</b>	Health and Safety
<b>AIR</b>	Attendance Intervention Reviews	<b>HoS</b>	Head of School
<b>APIs</b>	Application Programme Interfaces	<b>HSE</b>	Health and Safety Executive
<b>BAME</b>	Black, Asian and Minority Ethnic Backgrounds	<b>ICO</b>	Information Commissioners Office
<b>BCP</b>	Business Continuity Plan	<b>IHP</b>	Individual Healthcare Plan
<b>BFR</b>	Budget Forecast Return	<b>IRMS</b>	Information and Records Management Society
<b>CAMHS</b>	Child and Adolescent Mental Health Services	<b>IWF</b>	Internet Watch Foundation
<b>CEO</b>	Chief Executive Officer	<b>KCSIE</b>	Keeping Children Safe in Education
<b>CFO</b>	Chief Financial Officer	<b>KS1/2/3/4</b>	Key Stage 1/2/3/4
<b>CIF</b>	Condition Improvement Fund	<b>LAC</b>	Looked After Child
<b>CIN</b>	Child in Need	<b>LADO</b>	Local Authority Designated Officer
<b>CLA</b>	Children Looked After	<b>LGB</b>	Local Governing Body
<b>CMIE</b>	Child Missing in Education	<b>LLC</b>	Low-Level Concerns

<b>COO</b>	Chief Operating Officer	<b>LSA</b>	Learning Support Assistants
<b>COSHH</b>	Control and Substances Hazardous to Health	<b>MASH</b>	Multi-Agency Safeguarding Hub
<b>CP</b>	Child Protection	<b>MAT</b>	Multi-Academy Trust
<b>CPD</b>	Continuing Professional Development	<b>MFA</b>	Multi-Factor Authentication
<b>CSCS</b>	Children's Social Care Services	<b>MFL</b>	Modern Foreign Language
<b>CSE</b>	Child Sexual Exploitation	<b>NCSC's</b>	National Cyber Security Centres
<b>CTIRU</b>	Counter-Terrorism Internet Referral Unit	<b>NPQEL</b>	National Professional Qualification in Executive Leadership
<b>CWD</b>	Children with Disabilities	<b>PA</b>	Persistent Absence
<b>DBS</b>	Disclosure and Barring Service	<b>PAN</b>	Published Admission Number
<b>DDSL</b>	Deputy Designated Safeguarding Lead	<b>PECR</b>	Privacy and Electronic Communications Regulations
<b>DfE</b>	Department for Education	<b>PEP</b>	Personal Education Plan
<b>DHT</b>	Deputy Headteacher	<b>PEEP</b>	Personal Emergency Evacuation Plan
<b>DSE</b>	Display Screen Equipment	<b>PEx</b>	Permanent Exclusion
<b>DSL</b>	Designated Safeguarding Lead	<b>PLAC</b>	Previously Looked After Child
<b>DPO</b>	Data Protection Officer	<b>PP</b>	Pupil Premium
<b>EAL</b>	English as an Additional Language	<b>PSHE</b>	Personal, Social and Health Education
<b>ECT</b>	Early Career Teacher	<b>PSED</b>	Public Sector Equality Duty

<b>EHA</b>	Early Help Assessment	<b>PTFA</b>	Parent, Teacher and Friends Association
<b>EHCNA</b>	Education, Health and Care Needs Assessment	<b>RIDDOR</b>	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations
<b>EHCP</b>	Education, Health and Care Plan	<b>RHE</b>	Relationships and Health Education
<b>EHE</b>	Elective Home Education	<b>RSHE</b>	Relationships, Sex and Health Education
<b>ELSA</b>	Emotional, Literacy and Support Assistant	<b>SALT</b>	Speech and Language Therapist
<b>ESFA</b>	Education and Skills Funding Agency	<b>SARC</b>	Sexual Assault Referral Centre
<b>EVC</b>	Educational Visit Coordinator	<b>SBM</b>	School Business Manager
<b>EWO</b>	Education Welfare and Safeguarding Support Officer	<b>SCCs</b>	Standard Contractual Clauses
<b>EYFS</b>	Early Years Foundation Stage	<b>SDQ</b>	Strengths and Difficulties Questionnaire
<b>FBV</b>	Fundamental British Values	<b>SEMH</b>	Social, Emotional, and Mental Health
<b>FGM</b>	Female Genital Mutilation	<b>SENCO</b>	Special Educational Needs Coordinator
<b>FOI</b>	Freedom of Information	<b>SEND</b>	Special Educational Needs and Disabilities
<b>FSM</b>	Free School Meals	<b>SLA's</b>	Service Level Agreements
<b>FTS</b>	Find a Tender Service	<b>STEM</b>	Science, Technology, Engineering and Maths
<b>GAG</b>	General Annual Grant	<b>TA</b>	Teaching Assistant
<b>GDPR</b>	General Data Protection Regulation	<b>TCAT</b>	Three Counties Academy Trust
<b>GIAS</b>	Get Information about Schools	<b>VSH</b>	Virtual School Headteacher

## Statement of intent

Three Counties Academy Trust (TCAT), understands its responsibility to assess, prevent and control any risks from harmful bacteria, like legionella, and to implement suitable precautions across the TCAT estate 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 TCAT will keep the entire TCAT 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 TCAT aims to mitigate any risks involving legionella bacteria.

**NB. Where the term “parent” or “parents” is used this includes those who act as carers or have parental responsibility.**

## 1. 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

Where legislation has been passed or updated during the shelf life of this policy, we will always apply the latest version available irrespective of the version quoted here.

This policy operates in conjunction with the following policies and documents:

- Records Management Policy (FI2)
- Data Protection Policy (FI20)
- Health and Safety Policy (HS1)
- COSHH Policy (HS7)

Central TCAT policies have the policy number identified, e.g. "SG1". Where no policy number is identified this indicates the policy is a school specific policy available from an individual TCAT school's website.

## 2. Roles and responsibilities

As the employer, the Trust Board will be responsible for:

- Ensuring that risks pertaining to legionella are managed so far as is reasonably practicable

- Being legally responsible for all employees regarding health and safety
- Putting sensible and robust procedures in place to manage legionella risks that do not encourage unnecessary paperwork
- Implementing procedures that manage legionella risks to staff, pupils and visitors
- Informing all employees about legionella risks and the precautions they need to take to manage them
- Ensuring all employees have the relevant information and training necessary to manage legionella risks
- Ensuring that legionella control measures have been implemented and are still appropriate and effective

Furthermore, the Trust Board will work with Local Governing Bodies to:

- Ensure that the overall health and safety provision in each TCAT school is effective and sufficient, by following TCAT's policies and procedures
- Work closely with Trust Estate Manager, Headteachers/Heads of School and their SLTs to ensure health and safety provision in each TCAT school is effective
- Oversee sources of risks relating to legionella, e.g. checks of the water systems
- Prevent and control any risks that arise following a legionella risk assessment
- Ensure all staff receive adequate training to enable them to carry out their responsibilities
- Designate a competent person who will be responsible for ensuring TCAT schools meet their health and safety duties, including in relation to legionella – the competent person will be the Trust Estate Manager
- Review this policy and its effectiveness annually, in liaison with the competent person

Headteachers/Heads of School will be responsible for:

- Ensuring their school is following TCAT's health and safety policy and procedures
- Ensuring the day-to-day development and implementation of safe working practices and conditions for all staff, pupils and visitors
- Making sure that staff have the appropriate training in order for them to deal with risks in their areas of responsibility
- Introducing management systems and practices that ensure risks are dealt with sensibly, responsibly and proportionately
- Maintaining effective communication with the Trust Board, Local Governing Bodies, trade union safety representatives and school staff, and give pupils and visitors clear information about on-site risks

The Trust Estate Manager will be responsible for:

- Assisting with the creation and implementation of this policy
- Investigating accidents and incidents, understanding the causes and amending risk assessments as required
- Be the designated contact with the Local Authority (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
- 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
- Keep and maintain up-to-date records of any legionella risks and the control measures implemented

All staff will be responsible for:

- Acting in accordance with this policy at all times
- Reporting any concerns regarding legionella to the Trust Estate Manager 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 Trust Estate Manager in respect of health and safety
- Ensuring the health and safety of pupils

### 3. Identifying and assessing risks

The Trust Estate Manager will conduct a risk assessment to identify and assess any risks regarding legionella.

Where required, the Trust Estate Manager will seek advice when conducting the risk assessment, e.g. from external consultancies.

The Trust Estate Manager will understand, and ensure any other relevant staff understand, how to use the water systems and equipment associated with the systems, e.g. pumps.

By understanding the systems and related equipment, the Trust Estate Manager will ensure that any associated risks from exposure to legionella are identified. In each TCAT school, Trust Estate Manager will establish whether:

- The water temperature in all or some parts of the system is 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
- Details of monitoring, inspection and maintenance procedures
- Records of the monitoring results, 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 Trust Estate Manager 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 Trust Estate Manager 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 Trust Estate Manager will inform the appropriate members of staff, e.g. the CFO and control measures will be implemented.

#### **4. Managing risks**

The Trust Estate Manager operates in the capacity of the Health and Safety Officer, and has the authority, competence, understanding and skills to fulfil this role.

Where contractors are used to undertake water treatments, the Trust Estate Manager will ensure that the treatment meets all legal obligations.

#### **5. Preventing risks**

Following a risk assessment, the Trust Estate Manager will consider whether the risk of legionella can be prevented by reviewing the type of water system that is installed and assessing whether it is fit for purpose.

TCAT 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 Trust Estate Manager will develop a written control scheme, which will help TCAT to manage the risk of legionella in any TCAT school.

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 they will be carried out, to ensure the controls remain effective

To ensure the health and safety of the TCAT and school communities regarding preventing legionella, TCAT, through the Trust Estate Manager 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

TCAT 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.

## **6. Record keeping**

The Trust Estate Manager 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.

TCAT 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 by the Trust Estate Manager while they are current, and for at least two years afterwards. Additionally, any records of monitoring inspections will be kept for at least five years.

In addition to the previous list, TCAT should keep 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
- Names and positions of people responsible for implementing the written control scheme, their respective responsibilities and their lines of communication
- 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 signature of the person who carried out the work
- A log detailing visits by contractors, consultants and other personnel
- Cleaning and disinfecting procedures and associated reports and certificates
- Results of any chemical analysis of the water
- Results of any biological monitoring
- Information on other hazards, e.g. treatment chemicals
- Cooling tower and evaporative condenser notifications
- Training records of personnel

Records will be retained in line with TCAT's Records Management Policy and Data Protection Policy.

## 7. Incident reporting

All incidents of legionella will be reported as soon as possible to the Trust Estate Manager, who will be responsible for informing the Executive Headteacher/CEO, CFO and Headteacher/Head of School – the notification will cover:

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

If a member of the TCAT community is taken ill following exposure to legionella, the Chair of the Trust Board will be notified immediately.

## 8. Reporting procedure

Should an incident require [reporting](#), the Trust Estate Manager, 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](#).

Alternatively, the designated person can report fatal, specified and major incidents via telephone on 0345 300 9923 (Monday to Friday 8:30am to 5:00pm).

TCAT will notify the LA, in writing, if a cooling tower or evaporative condenser is present on site and include details about where they are located. TCAT will also inform the LA if and when such devices are no longer in use.

## 9. 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 Trust Estate Manager will complete the relevant form as outlined above.

## **10. Implementing a control scheme**

TCAT will avoid using water systems, parts of water systems or systems of work that lead to exposure of legionella as far as reasonably practicable. The Trust Estate Manager will establish a written control scheme in instances where it is not reasonably practicable to avoid these.

The implementation of any written control scheme will be monitored by the Trust Estate Manager.

The Trust Estate Manager will supervise anyone involved in any related procedure of the written control scheme.

The Trust Estate Manager 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 Trust Estate Manager will ensure that there is an appropriate number of site staff available during all hours that the water system is operating – this will be established depending on the risks the water system poses.

The Trust Estate Manager, or other designated site staff, will be contactable during all hours that the water system is in operation.

There will be established methods for communication and management when there are several people who are responsible for the control scheme.

TCAT will be responsible for the health and safety of the TCAT community, regardless of if contractors are employed for any reason.

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 not to be 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 or not

## Monitoring and review

This policy will be reviewed in line with the published schedule at the front of this document and at any point material changes require it by the Executive Headteacher/CEO in collaboration with the Board appointed Trustee, the Trust Board and Executive and Senior Leadership.

Any changes made to the policy will be amended by the Executive Headteacher/CEO and will be communicated to Executive Leaders, the TCAT Central Team and to Headteachers/Heads of School, who, in turn, will alert school-based staff.

The next scheduled full review date for this policy is 26<sup>th</sup> February 2029.

Signed by:

\_\_\_\_\_ Executive Headteacher/CEO

Date: \_\_\_\_\_

\_\_\_\_\_ Board appointed Trustee

Date: \_\_\_\_\_

## Appendix A: Legionella Risk Assessment Template

**Important note:** *This risk assessment identifies typical examples and controls to illustrate how schools may manage certain risks. These can be used as a guide to think about hazards in your school and the steps needed to manage those risks. In order to be compliant with the law and protect your community, you must consider the specific hazards and controls your school needs and **must not** use this template without assessing your school's risks.*

### Name of school

Assessment conducted by:	Job title:	Covered by this assessment:
Date of assessment:	Review interval:	Date of next review:

Risk rating		Likelihood of occurrence		
		Probable	Possible	Remote
Likely impact	<b>Major:</b> Causes major physical injury, harm or ill health.	High (H)	H	Medium (M)
	<b>Severe:</b> Causes physical injury or illness requiring first aid.	H	M	Low (L)
	<b>Minor:</b> Causes physical or emotional discomfort.	M	L	L

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
Insufficient awareness of school procedures	Staff, pupils and visitors	<u>M</u>	<ul style="list-style-type: none"> <li>The school has a <a href="#">Legionella Health and Safety Policy</a> with clear procedures to protect against the risk of legionella.</li> <li>The school implements a <a href="#">Legionella Control Scheme</a> in line with the HSE Approved Code of Practice for '<a href="#">The control of legionella bacteria in water systems</a>' for all identified risks that it is unable to prevent or remove.</li> <li>The school consults staff or their representatives on the risks of exposure and measures taken to control the risks.</li> <li>All staff act in accordance with school procedures and understand their role in risk management and how to report concerns.</li> <li>The school assigns a competent person with overall responsibility for controlling any identified risk from exposure to legionella bacteria.</li> <li>The Trust Board assures itself that the competent person has the relevant</li> </ul>	<p><b>[Outline what additional steps are required in line with an assessment of your school's specific circumstances to eliminate the hazard or control the risk].</b></p>	<a href="#">Trust Estate Manager</a>	<a href="#">Signature</a> <a href="#">Date</a>

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
			<p>authority, skills, knowledge and experience for the role.</p> <ul style="list-style-type: none"> <li>• The competent person ensures all operational procedures are carried out effectively and in a timely manner.</li> <li>• The risk assessment for managing the risk of legionella is reviewed <b>annually</b>, and as soon as possible if there is reason to suspect they are no longer valid.</li> </ul>			
Failure to identify risks of legionella	Staff, pupils and visitors		<ul style="list-style-type: none"> <li>• An easy-to-read schematic diagram of the system is produced to inform the risk assessment process.</li> <li>• Sources of possible risk of legionella from school activities and water systems are identified as part of a site inspection by the competent person.</li> <li>• The competent person considers: <ul style="list-style-type: none"> <li>- The source of system supply water, e.g. whether from a mains supply or not.</li> <li>- Possible sources of contamination of the supply water</li> </ul> </li> </ul>			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
			<p>in the premises before it reaches any part of system presenting a risk of exposure to legionella, e.g. the cold-water storage tank.</p> <ul style="list-style-type: none"> <li>- The normal operating characteristics for the school's system.</li> <li>- Unusual but reasonably foreseeable operating conditions, e.g. breakdowns.</li> <li>- Any means of disinfection in use.</li> <li>- The review of any current control measures.</li> <li>- The local environment.</li> </ul>			
Cold water infection	Staff, pupils and visitors		<ul style="list-style-type: none"> <li>• The water system is reviewed to ensure conditions that create a spray or aerosol are avoided as much as possible and the release of droplets is minimised.</li> <li>• Tanks are fitted with a cover, insect screens and have tight fitting lids to</li> </ul>			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
			<p>prevent contamination and debris entering the system.</p> <ul style="list-style-type: none"> <li>• The cold-water tank is located in a cool place and protected against extremes of temperature.</li> <li>• Cold water pipework is insulated effectively and kept away from heat sources.</li> <li>• Cold water storage is minimised, holding enough for a day's use only where possible, and has no build-up of scale or sludge.</li> <li>• Cold water is stored below 20°C and checks undertaken to ensure the temperature is below 20°C within two minutes of running the water.</li> <li>• The water system reduces stored cold water to the minimum needed to meet peak needs.</li> <li>• Cold water tank temperatures are checked at least every six months.</li> </ul>			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
			<ul style="list-style-type: none"> <li>• Cold water storage tanks are cleaned and disinfected annually, unless specified more regularly as part of the Legionella Control Scheme.</li> <li>• Sentinel outlets, i.e. the furthest and closest to each tank or cylinder, are subject to monthly checks for distribution temperatures.</li> </ul>			
Hot water infection	Staff, pupils and visitors		<ul style="list-style-type: none"> <li>• Hot water distribution pipes are insulated effectively.</li> <li>• Long pipe runs between thermostatic mixing valves (TMVs) and outlets are avoided – pipe runs downstream do not exceed 2m.</li> <li>• Biocide treatments are used for cooling towers.</li> <li>• Hot water is stored above 60°C and distributed at above 50°C – checks ensure that the temperature is at least 50°C within one minute of running the water.</li> </ul>			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
			<ul style="list-style-type: none"> <li>• Staff and pupils are informed to raise concerns about the temperature of water at distribution points, e.g. if it is colder or hotter than usual.</li> <li>• The competent person is notified immediately where the water temperature does not meet expected levels.</li> <li>• Hot water storage cylinder temperatures are checked monthly.</li> <li>• Water is drained from hot water cylinders to check for debris or signs of corrosion on an annual basis.</li> </ul>			
Inadequate cleaning protocols	Staff, pupils and visitors		<ul style="list-style-type: none"> <li>• Materials in the water system are used which do not support microbial growth and can be easily disinfected.</li> <li>• Appropriate cleaning and disinfection procedures are in place.</li> <li>• The competent person ensures parts of the system requiring regular cleaning are easily accessible, readily removable and easily dismantled.</li> </ul>			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
			<ul style="list-style-type: none"> <li>The competent person routinely checks, inspects and cleans the system.</li> <li>Internal inspections for signs of debris and possible contamination are undertaken every six months for potable water and annually for non-potable water.</li> <li>Showerheads are cleaned, disinfected and descaled at least once every three months.</li> <li>Procedures for the safe storage, handling, use and disposal of chemicals are clearly documented in the <a href="#">Legionella Control Scheme</a> and the <a href="#">Control of Substances Hazardous to Health (COSHH) Risk Assessment</a>.</li> </ul>			
Contracted works	Staff, pupils and visitors		<ul style="list-style-type: none"> <li>The competent person ensures water treatment or other work is carried out to the required standard.</li> <li>The school makes reasonable enquiries to ensure organisations are competent, staff are suitably trained and have the necessary equipment to safely and</li> </ul>			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
			<p>adequately carry out their duties under the <a href="#">Legionella Control Scheme</a>.</p> <ul style="list-style-type: none"> <li>• Where possible, the school uses service providers registered with an accredited scheme, e.g. the Legionella Control Association.</li> <li>• Water systems will only be used after work once it has been declared safe by the contractor.</li> </ul>			
Insufficient understanding of school water systems	Staff, pupils and visitors		<ul style="list-style-type: none"> <li>• The school ensures it has a documented record of its water system, the equipment associated with the system, e.g. pumps, showers, and its constituent parts.</li> <li>• The competent person identifies whether any of the following criteria which can increase the risk of infection apply: <ul style="list-style-type: none"> <li>- The water temperature in all or some parts of the system is between 20–45 °C.</li> <li>- Water is stored or re-circulated as part of the system.</li> </ul> </li> </ul>			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
			<ul style="list-style-type: none"> <li>- There are sources of nutrients, e.g. sludge, scale, rust, organic matter and biofilms.</li> <li>- The conditions are likely to encourage bacteria to multiply.</li> <li>- 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.</li> <li>• The use of water systems, parts of systems or systems of work that lead to a reasonably foreseeable risk of exposure to legionella bacteria are avoided as far as is reasonably practicable.</li> </ul>			
High-risk individuals	Individual at high-risk		<ul style="list-style-type: none"> <li>• The competent person considers whether it is likely that staff, pupils and visitors are more susceptible to infection, e.g. due to age or a medical condition, and if they could be exposed to any contaminated water droplets.</li> </ul>			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
			<ul style="list-style-type: none"> <li>Appropriate measures are in place to minimise the exposure of high-risk individuals to legionella bacteria, e.g. high-risk staff are not assigned any monitoring responsibilities.</li> </ul>			
Cooling towers	Staff, pupils and visitors		<ul style="list-style-type: none"> <li>The school notifies the LA in writing of any cooling towers or evaporative condensers on site, including location details.</li> <li>The LA is notified if and when such devices are no longer in use.</li> <li>The system of dry/wet coolers or condensers are assessed against the notification requirements defined in the Notification of Cooling Towers and Evaporative Condensers Regulations 1992.</li> <li>An effective microbiological control programme is in place for cooling towers with suitable biocide treatments.</li> </ul>			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
Stagnant water	Staff, pupils and visitors		<ul style="list-style-type: none"> <li>• The competent person considers dead legs and parts of the system used intermittently as part of the site-specific risk assessment.</li> <li>• Pipe lengths are kept as short as possible.</li> <li>• Redundant pipework is removed or the system altered to avoid it.</li> <li>• Outlets used infrequently, including showerheads and taps, are flushed weekly with running water for <b>five</b> minutes at a low flow rate to avoid producing aerosols.</li> <li>• All water outlets will be flushed following periods of non-use of <b>four</b> days or longer, except where disinfection procedures apply.</li> <li>• A record is kept monitoring all flushing and ensure it is undertaken weekly at all relevant outlets.</li> <li>• Water samples are taken and analysed <b>annually</b> by an accredited competent</li> </ul>			

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			company – remedial action is taken as soon as possible where required.			
Incorrect execution of the legionella control scheme	Staff, pupils and visitors		<ul style="list-style-type: none"> <li>• The competent person monitors the <u>Legionella Control Scheme's</u> implementation and supervises those involved in any related operational procedure.</li> <li>• Staff responsibilities and lines of communication are clearly defined.</li> <li>• Appropriate staff levels are available during all hours the water system is operating.</li> <li>• Appropriate arrangements are in place to allow the competent person or an authorised deputy to be contacted at all times.</li> <li>• Remedial measures are detailed and followed in the event of control limits being exceeded.</li> </ul>			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
			<ul style="list-style-type: none"> <li>• Test frequencies and procedures are followed.</li> <li>• Details of contact arrangements for emergency call-out personnel are clearly displayed at access points to all water systems.</li> </ul>			
Ineffective monitoring procedures	Staff, pupils and visitors		<ul style="list-style-type: none"> <li>• The competent person monitors the condition and performance of the system where they are trained to do so.</li> <li>• A suitable external contractor is used to undertake any monitoring, testing and inspection procedures as appropriate.</li> <li>• The frequency and extent of routine monitoring reflects the operating characteristics of the system.</li> <li>• Water quality is subject to routine tests.</li> <li>• The results of monitoring and testing are interpreted by the competent person, or an external contractor where necessary, and remedial measures are undertaken promptly as required.</li> </ul>			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
Missing or incomplete records	Staff, pupils and visitors		<ul style="list-style-type: none"> <li>• Suitable records are kept of significant findings of risk assessments, inspections, tests, repairs and control measures in line with HSE guidance.</li> <li>• Records are retained throughout the period they are current and for at least two years afterwards.</li> <li>• Records of any monitoring inspection, test or check carried out, and the dates, are retained for at least five years.</li> <li>• Records are signed and verified by individuals performing the tasks assigned to them.</li> <li>• Information on risks and control measures provided by relevant third parties, e.g. manufacturers, installers, is recorded and followed.</li> </ul>			
Legionellosis infection	Staff, pupils and visitors		<ul style="list-style-type: none"> <li>• Areas of known infection are withdrawn from use until disinfection by an approved contractor is complete.</li> </ul>			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
			<ul style="list-style-type: none"> <li>• Staff are informed of the symptoms of legionellosis.</li> <li>• Staff concerned that they may have legionellosis are instructed to contact their GP immediately.</li> <li>• The school notifies the LA and the local health protection team (HPT) of an incident of legionellosis at the school.</li> <li>• The HSE is notified of any cases of legionellosis in a staff member who has worked on cooling towers or hot and cold-water systems that are likely to be contaminated with legionella.</li> <li>• An investigation is launched following any instance of legionellosis, and the school's procedures are reviewed and amended where necessary to avoid reoccurrence.</li> </ul>			
Untrained staff	Staff, pupils and visitors		<ul style="list-style-type: none"> <li>• The competent person is trained to a level to ensure tasks are carried out safely and appropriately and receives refresher training every <b>two years</b>.</li> </ul>			

Hazard	Who may be harmed	Risk rating L/M/H	Existing controls	Further action required	Assigned to	Completed
			<ul style="list-style-type: none"> <li>• Relevant staff are provided with instruction and training on control measures for legionella.</li> <li>• Staff speak to the <a href="#">Headteacher/Head of School</a> if they feel they require further training to carry out their duties relating to controlling the risk of legionella.</li> <li>• Training records are kept up to date.</li> </ul>			