



# Moorland School

## LEGIONELLA POLICY

**This Policy includes the Junior School, Senior School and Nursery**

### **Legionella Control Policy**

This policy sets out the School's approach to managing significant legionella risks associated with water systems.

### **Scope**

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 Moorland 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.

### **Relevant 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 \(HSE\).](#)
- [Technical Guidance HSG274](#)

Note: There are specific water quality and water hygiene regulations that apply to mains-fed water storage and supply systems which will also need to be considered when implementing this policy.

### **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.

### **Departmental Equipment**

Any specialist water systems or equipment that is independent of a building's water supply. Examples (this list is not definitive) could include 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.

### **Policy Statement**

Moorland School is committed to reducing, so far as is reasonably practicable, the reasonably 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 publication "Legionnaires' disease. The control of legionella bacteria in water systems. Approved Code of Practice and guidance L8 (Fourth Edition). Health and Safety Executive (HSE)". This will include:

- Appointing one or more Responsible Person (Legionella) 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.
- 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.

## Responsibilities

The Headteacher has the overall day to day responsibility for health and safety matters at the School and therefore acts as the duty holder for legionella management at the School. The Headteacher delegates responsibility for undertaking aspects of these duties through line management and identified roles.

The following people are identified as having specific responsibilities under this policy (in addition to any other responsibilities under other health and safety policy) for the control of legionella issues in those water systems, and for those relevant persons, that fall within their budgetary control:

### 1. Domestic Hot and Cold Water Systems

The Assistant Headteacher has been appointed as the specific Responsible Person (Legionella) for those domestic hot and cold water systems whose maintenance and upkeep falls within their budgetary control. The appointed Responsible Person (Legionella) will ensure that:

- Suitable resources are allocated for the management of legionella risk in domestic hot and cold water systems. This includes the written appointment of relevant people within their line management chain to deputise for them where necessary and the allocation of sufficient budget to manage legionella risk at least in accordance with legal requirements.
- Suitable and sufficient risk assessments are undertaken of all in-scope systems.
- Risk assessments are undertaken by suitably competent persons.
- A bespoke legionella management plan is developed for each system by a suitably competent person. 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.
- The Maintenance team 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 implemented and is subject to periodic audit (at least annually).
- Submitting annual statements of reassurance to the School’s Health and Safety Committee to confirm that legionella risks are being appropriately controlled.
- 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 Duty-Holder 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.

Each Responsible Person (Legionella) may, subject to written agreements or contracts being in place, engage competent third parties (for example another Responsible Person (Legionella), external consultants or contractors) to carry out one or more of the tasks associated with managing legionella risk. The Assistant Headteacher has formally appointed Mr Roy Frost and Mr Bert Ashworth of the Maintenance Team to manage legionella risk on their behalf.

However, it should be noted that this appointment does not remove the overall responsibility on the Assistant Headteacher for ensuring that legionella risk is managed in those in-scope systems that they retain any budgetary control, whatsoever, over.

#### **The Headteacher will:**

- Cooperate with the Duty-Holder and appointed Deputy / Responsible Person (Legionella) to enable them to meet their responsibilities under this policy.
- 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.
- Alert the Responsible Person (Legionella) to any redundant or little used hot and cold water outlets within their areas.
- Not permit alterations, additions or other works to be carried out by their staff or students or by contractors directly employed by their School or Department without first seeking written approval from the Deputy / Responsible Person (Legionella).

#### **Monitoring**

**Moorland School Health and Safety Committee** will be responsible for:

- Monitoring and reviewing this policy. Reviews will be carried out every two years from the date of approval.
- Receiving and reviewing annual statements of reassurance from Duty-Holders.

#### **Further Information and resources**

[Guidance for managing Legionella Risk in School, Faculty and Departmental Water Systems and Equipment](#)

[Legionnaires' disease. The control of legionella bacteria in water systems. Approved Code of Practice and guidance L8 (Fourth Edition). Health and Safety Executive (HSE)]. Technical Guidance HSG274 Parts 1, 2 and 3 Legionnaires' disease: A brief guide for duty-holders HSE Resources: Guidance Documents, Videos and Useful Links

*Reviewed and updated by Deborah Frost, Assistant Headteacher, August 2020*

*Next Review Date: August 2021*