



# Holly Park School Legionella Policy

## 1. Aim

The aim of this policy is to provide an adequate scheme for legionella control

Links to the UN Rights of the Child

Article 24

Every child has the right to the best possible health. Governments must work to provide good quality health care, clean water, nutritious food and a clean environment so that children can stay healthy. Richer countries must help poorer countries achieve this.

## 2. Legislation

- **The requirement for ongoing water management is defined in the legislation and HSE's approved code of practice L8**
- **H&S at work Act 1994**
- **Management of H&S at work regulations 1999**
- **Control of Substances Hazardous to Health Regulations 2002 COSHH**
- **Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 RIDDOR**

## 3. Introduction

It is important that where a significant risk is identified that a programme of controlling the risk is developed.

Due to the nature of educational establishments, it is common that an inherent risk will be present due to the significant volumes of stored water and the intermittent use resulting from half terms and end of term breaks.

As a result, a basic control scheme will normally be needed to manage the risks in most schools, colleges and universities. The control scheme should be fully implemented, managed and monitored to ensure effective control of the risks.

All records should be kept for a minimum of **5 years** in accordance with the HSE's ACOP L8.

It is also important to appoint a person to be managerially responsible for the water services – This is the site manager.

#### **4. Managing Legionella**

It is important to have in place:

- A risk assessment
- A scheme of control

#### **5. The Chain of Events – Identified sources of risk**

Each element of this chain needs to be managed so that the chain is broken

- Bacteria present in water
- Slow moving or stagnant water
- Adequate food source for the disease to feed off
- Temperature range 20-50degrees
- Aerosols formed
- People inhale

#### **6. The management and responsibility structure for the control of the water services.**

- 1) Barnet are the employer and are responsible for monitoring and take ultimate responsibility
- 2) The Duty Holder/Responsible Person (delegated by Barnet) – Headteacher
- 3) The nominated competent person – Site Manager is managerially responsible and is delegated to ensure that the log book and risk assessments are up to date and that resulting actions from monthly testing and risk assessments are acted upon and reported to governors
- 4) A Council responsible person – to ensure that statutory duties are being carried out by the school
- 5) There is a routine maintenance programme to ensure the water services are routinely monitored for cleanliness and safe operation by Clearwater
- 6) We have appointed Clearwater to undertake a risk assessment which is done bi annually unless there are any changes to the water system or there is a positive reading
- 7) There is a water Log book that is a record of regular testing and checks

#### **7. Ask the following questions?**

In order to achieve compliance to the legislation, it is essential that employers and those with responsibility for the control of educational premises ask the following:

- 1) All areas or services capable of releasing an aerosol such as showers, spray taps and cooling towers etc should be identified and where necessary measures put in place to control the risks. Do you have any systems or equipment that can create an aerosol during normal operation. This may be showers, spray taps, or sprinkler /irrigation systems etc? **Shower in Nursery**
- 2) Are there any dead legs in your pipe work? **No**

- 3) Do you have a rainwater harvesting or Grey water system and what is the likelihood of cross contamination to other water supplies? **Allotment – no cross contamination**
- 4) Are any water treatment products being used such as UV or chemicals etc? **No**
- 5) Are there individuals present in the building who may be particularly susceptible to infection?  
**Nursery children**
- 6) Are there any taps not used regularly? – **An outside tap in nursery**

## **8. Risk Assessment**

Risk assessments for legionella should include:

- A schematic diagram of the water system
- A water sources register
- Photographic records
- Conclusions of tests/checks
- Action plans
- Temperature monitoring
- Hot and cold water inspection
- Water storage
- Likelihood of contamination
- It should follow the code of practice

## **9. The Water Log Book**

The water log book should include:

- Training records
- Signatures of people doing any work or testing
- Schematic drawings or plans
- A visit log of engineers
- Monthly outlet temperatures
- Results of water analysis
- Disinfection/Chlorination certification

## **10. Basic tasks required to control legionella in domestic hot and cold water systems in School**

The majority of Schools will have simple domestic hot and cold water systems. The table below shows how to manage systems and needs to be followed.

|                     |   |
|---------------------|---|
| <b>Weekly Tasks</b> | Regular (preferably weekly) flushing of any outlets and showers that are infrequently used (less than once per week). Precautions should be taken to minimise aerosol release when implementing a flushing programme. |
|---------------------|---|

|                      |  |
|----------------------|--|
|                      | <b>This is conducted by the Site Manager</b>   |
| <b>Monthly Tasks</b> | <p>Water temperatures should be recorded at the nearest and furthest outlets from the storage tanks and calorifier water heaters. Monthly monitoring of boiler temperatures. Water temperatures in the flow and return pipes to the calorifier should be monitored and recorded. Hot water temperatures should be recorded from outlets after 1 minute of operation. Cold water should be tested after 2 minutes of operation. A programme should be set to ensure that all the taps within the building are checked at least once, annually.</p> <p><b>This is done by Clearwater</b></p> |
| <b>Quarterly</b>     | <p>All showerheads and hoses should be dismantled, cleaned and de scaled on a quarterly basis. This action should be recorded.</p> <p><b>This is done by the Site Manager</b></p>  |
| <b>Six Monthly</b>   | <p>Tank temperatures recorded</p> <p><b>This is done by Clearwater</b></p>   |
| <b>Annually</b>      | <p>The condition of the tanks should be reviewed annually. Where the presence of organic material, vermin and water quality deterioration is identified etc. Remedial actions should be conducted. The conditions inside the boiler should be recorded and addressed where required and a sample should be taken from the drain outlet.</p> <p>Annual legionella sampling<br/>Annual microbiological sampling<br/>Annual Chlorination</p> <p><b>This is done by Clearwater</b></p>   |

## **11. Managing the water services during school holidays and low occupancy periods**

It is extremely important to manage the risk of legionella during school holidays and periods of low water usage or closures. Such periods will provide the perfect opportunity for bacterial growth and proliferation including the growth of legionella within the schools water systems and services.

When a building is occupied but at a significantly lower capacity to normal operation then the outlets which are used less than once per week should be flushed by the site manager weekly

## **12. Training**

Training should be completed by the Site Manager and the Headteacher. Retraining should be undertaken as a result in LA change in policy or new legislation. Otherwise training should be revisited every 3 years.

## **Document Control**

### **Revision History**

| Version | Revision Date | Revised By                   | Revision                    |
|---------|---------------|------------------------------|-----------------------------|
| I.0     | Autumn 2013   | Ann Pelham & Simon Reid      | Revised                     |
| I.1     | Summer 2014   | Premises Committee           | Amended, adopted & ratified |
| I.2     | Summer 2015   | Premises Committee           | Amended, adopted & ratified |
| I.3     | Summer 2016   | Premises Committee           | Amended, adopted & ratified |
| I.4     | Summer 2017   | Premises Committee           | Amended & ratified          |
| I.5     | Summer 2018   | Premises Committee           | Amended & ratified          |
| I.6     | Summer 2019   | Premises Committee           | Amended & ratified          |
| I.7     | Summer 2020   | Premises Committee           | Amended & ratified          |
| I.8     | Summer 2021   | Finance & Premises Committee | Amended & ratified          |

### **Signed by**

|                    | Name         | Signature | Date |
|--------------------|--------------|-----------|------|
| Headteacher        | Ann Pelham   |           |      |
| Chair of Governors | Tim Graveney |           |      |

### **Distribution**

| Shared with  |
|--|
| <ul style="list-style-type: none"> <li>• Staff via school server</li> <li>• Parents via Website</li> <li>• Governors via committee meetings</li> </ul> |

|                      |
|----------------------|
| Date for next review |
| Summer 2022          |