

Health & Safety Policy

HSP 7

Legionella Management

Key Document details:

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Date: **September 2020**

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Version No.: **1.4**
Next review date: **September 2022**

Ratified: **September 2020**

Title:	HSP 07 – Legionella Management
Author(s):	David Maine
Date:	September 2020
Review date:	September 2022
Application:	This policy applies equally to all The White Horse Federation (TWHF) employees including agency or casual staff, and to all premises where TWHF is either the ‘employer’ or is in control of the premises.

Definitions	For the purpose of this policy, the following definitions apply;	
	Legionella	Type of aerobic bacterium, found naturally in all water and will multiply in warmer water. (Singular of legionellae).
	Legionnaire’s Disease	A form of pneumonia caused by legionella bacteria.
Policy Aims	<p>The aims of implementing this policy are :</p> <ul style="list-style-type: none"> • to safeguard anyone who may be affected by <i>Legionella</i> within or close to any TWHF premises • to ensure an effective management system is in place, including monitoring and review • to adopt the principles of control and management as specified in HSE publication : Approved Code of Practice – ‘<i>The Control of Legionella Bacteria in Hot and Cold Water Systems (ACoP L8)</i>’: • to manage the potential contamination of water systems • to enable THWF to comply with its legal duties by :- • identifying and assessing sources of risk • preparing a scheme to prevent and control risk • implementing, managing and monitoring all precautionary control measures identified • considering alternative systems or processes designed to eliminate any risks • keep records of precautionary measures identifying the responsibilities of any employee or contractor 	
Policy	To ensure the health and safety of all people who come to work or visit TWHF controlled buildings, and others from the risk of infection presented by Legionella bacteria present in TWHF water systems and to implement the standards of HSE Approved Code of Practice (L8), so far as is reasonably practicable.	
Risk	Exposure of TWHF employees and others to Legionella bacterium with the potential of contracting Legionnaire’s disease	
Responsibility	The Chief Executive Officer (CEO) is considered to be the duty holder. The duty to manage Legionella within TWHF has been delegated by the CEO to the Director of Estates and Facilities. This responsibility is discharged primarily at the line management/operational level.	
	Roles & Responsibilities	
I.	Roles and responsibilities are defined in HSP 2 Organisation. Any specific actions are detailed in the arrangements section below.	
	Arrangements	

1.	<p>Control Methodology/Principles of Control</p> <ul style="list-style-type: none"> • THWF will schedule, design, order and monitor all controls necessary to reasonably practicably manage legionella bacteria within its premises. • TWHF will implement, procure, advise and report on controls necessary to manage legionella bacteria within premises. • Site Managers will ensure that equipment is serviced (including inspection, cleaning and disinfecting) and maintained to the standard required to control legionella bacteria within TWHF. • The risk from exposure will normally be controlled by measures which do not allow the proliferation of legionella bacteria in hot and cold water systems and reduce exposure to water droplets and aerosol. Precautions should, where appropriate, include the following: <ul style="list-style-type: none"> • controlling the release of water spray; • avoiding water temperatures between 20°C and 50°C (unless mixed at the outlet). Water temperature is a particularly important factor in controlling the risks; • avoiding water stagnation, which may encourage the growth of biofilm; • avoiding the use of materials in the system that can harbour or provide nutrients for bacteria and microbial growth; • keeping the system clean to avoid the build-up of sediments which may harbour bacteria (and also provide a nutrient source for them); • the use of a suitable water treatment programme where it is appropriate and safe to do so; • ensuring that the system operates safely and correctly and is well maintained. • Individual premises will ensure records of servicing and maintenance are kept. Legionella logbooks for each building (or premises) will contain records of control measures implemented. These will contain the following: <ul style="list-style-type: none"> • Risk Assessment for the system. • Schematic diagrams of the system. • Records of control checks taken. • Records of any remedial work carried out. • Internal auditing of Legionella compliance will take place on a regular basis. • As a policy TWHF adopts a temperature regime for Legionella Control. However, where problems have been encountered in maintaining temperature control and cost prohibits an engineered solution then the additional control measure of biocide treatment in the form of chlorine or other oxidising biocides can be utilised and monitored. • Contractors shall comply with TWHF with regard to Legionella Management and ensure they work within this the legislation. • Only competent persons (Legionella) will work on THWF water systems where the testing, monitoring, maintenance, design, alteration or installation activities have been approved and authorised by the Site Manager or Regional Estates Manager, ensuring that their activities limit or prevent the conditions conducive to the proliferation of Legionella bacteria. • Contractors working on water systems within THWF, in whatever capacity, shall be required to demonstrate their competence to do so, an example being registration under the Water Regulations Advisory Scheme (WRAS).
2.	<p>Documentation – Risk Assessment</p> <ul style="list-style-type: none"> • A Legionella Risk Assessment will be carried out by a competent person to assess the risk of exposure to legionella bacteria from work activities and water systems on the premises and any precautionary measures needed. • If the assessment shows that there is a reasonably foreseeable risk of exposure to Legionella bacteria, there must be a written scheme in place to control that risk. • The dutyholder is responsible for ensuring the risk assessment is carried out.

	<ul style="list-style-type: none"> • The written scheme for controlling the exposure must be implemented and properly managed. • The scheme must include instructions on the operation of the system and details of the precautions to be taken to control the risk of exposure to Legionella bacteria, including checks and their frequency. • The recommended inspection frequencies should be based on the HSE Approved Code of Practice and Guidance L8:“Legionnaires disease - The control of Legionella bacteria in water systems”. • All records must be kept at the premises. They must be maintained and managed under the control of the Site Manager, and retained for a period of at least 5 years following expiry. • It is TWHF’s policy that risk assessments should be reviewed as and when changes render the original assessment as unfit for purpose, such as: <ul style="list-style-type: none"> - a change to the water system or its use; - a change to the use of the building where the system is installed; - new information available about risks or control measures; - the results of checks indicating that control measures are no longer effective; - changes to key personnel; - a case of legionnaires’ disease/legionellosis associated with the system. <p>Note: Although the L8 does not specify a timescale for review, TWHF will adopt a review schedule every 2 years.</p>
3.	<p>Monitoring, Inspections and Checks</p> <ul style="list-style-type: none"> • To control the risk of infection, a temperature monitoring programme will be carried out on a monthly basis by the Site Manager. All results are to be recorded on the temperature monitoring log sheet and retained within the Legionella Log Book. • Expectations: cold water below 20°C with no significant heat gain after running for 2 minutes, hot water above 50°C within 1 minute of running outlet, with a maximum temperature of 60°C. • Note: A reduced temperature of 43°C is employed where the risk of scalding is present in areas where children under 8 years and vulnerable people have access. • All anomalies are to be reported immediately to the Regional Estates Manager. <p>Water Analysis</p> <ul style="list-style-type: none"> • In the event of additional water analysis being required, a competent service contractor shall attend the sites as required and take samples which should be analysed at UKAS accredited laboratories. • The competent service contractor shall provide a standard of service described in the Code of Conduct for Service Providers produced by the British Association for Chemical Specialities and the Water Management Society and hold a current registration certificate issued by the same organisation.
4.	<p>Training</p> <p>Site Managers with specific duties (monitoring temperatures or flushing), will be trained to ensure they have the required level of knowledge and understanding relevant to their work activities.</p>
5.	<p>Limitations of this Policy</p>

	The policy cannot anticipate all eventualities; therefore professional judgement should be used to identify the appropriate course of action needed to protect those who are vulnerable and/or at risk. This judgement should derive from multi-disciplinary team discussion rather than any one individual where possible.
6.	Appendices None

Date	Issue	Section	Changes
September 2020	1.4	2	Some rewording

