Legionella Management Policy
(Version 4)
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Introduction
This Policy defines the College’s arrangements for the management of Legionella and the measures to be taken for the protection of staff, students and visitors to its premises. It defines how the College will identify and manage the risks arising from exposure to Legionella bacteria in water systems.

The Policy also takes into account the formal requirements to manage risk contained in the Health and Safety at Work etc. Act 1974, the Control of Substances Hazardous to Health Regulations 2002 (as amended), the Management of Health and Safety at Work Regulations 1999 (as amended), and the requirement to report any legionella incident under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).

The arrangements are based on the requirements contained in the Approved Code of Practice (L8) ‘Legionnaires disease, and the control of legionella bacteria in water systems Approved Code of Practice’, and HSG 274: Legionnaires’ disease: Technical Guidance. The fourth edition of the ACOP main changes are removing Part 2, the technical guidance, which is published separately as HSG274 and giving the following issues ACOP status:

- risk assessment;
- the specific role of an appointed competent person, known as the 'responsible person';
- the control scheme;
- review of control measures;
- duties and responsibilities of those involved in the supply of water systems.

This Policy should not be considered a definitive guide to the management of legionella and the requirements of the Regulations. Where any doubt exists as to the action to be taken, or advice or assistance is required, contact should be made with the Director of Health and Safety.

Copies of those documents referred to above and other useful reference material are available from the Responsible Person or the Director of Health and Safety, and information is available on the Health and Safety Executive website.

The Policy applies to all areas of the College Estate without exception.

Legionnaires’ Disease

1. Legionnaires’ disease is a potentially fatal form of pneumonia caused predominantly by the \textit{Legionella pneumophila} bacteria. \textit{Legionella pneumophila} and related bacteria are common in natural water sources such as rivers, lakes and reservoirs, but usually in low numbers.

2. Since Legionella bacteria are widespread in the environment, they may also contaminate and grow in purpose-built (man-made) water systems such as cooling towers, evaporative condensers and hot and cold water systems. Under certain favourable conditions created in these man-made water systems, Legionella bacteria can multiply, increasing the risk that human exposure to the bacteria will occur. The principle sources of risk within the College are:

- Hot and cold water services within buildings
- Evaporative cooling systems
- Safety showers
- Eye wash stations
- Fire-fighting and hose reel systems
- Horticultural misting systems
- Scientific and other equipment temporarily or permanently connected to the water system.

3. Legionnaires’ disease is normally contracted by inhaling Legionella bacteria in tiny droplets of water (aerosols), deep into the lungs; there is no documented evidence of the disease passing from person to person.

4. It can affect anyone, however, some people are at higher risk of infection, including:

- People over 45 years of age
5. Legionella bacteria can also cause less serious illnesses which are not fatal or permanently debilitating. The collective term used to cover the group of diseases caused by Legionella bacteria is Legionellosis.

College Policy Statement for Legionella Management

6. The College recognises its legal responsibilities, to take all reasonable precautions to prevent or control the risks to staff, students and others from exposure to Legionella bacteria.

7. To comply with its legal duties the College will:
   - Adopt the guiding principles set out in relevant Approved Codes of Practice
   - Identify and assess sources of risk
   - Appoint a ‘Responsible Person’ to assist the College to meet its health and safety duties and take responsibility for controlling any identified risk
   - Clearly define the organisational arrangements for achieving compliance (see Roles and Responsibilities)
   - First consider whether the risk of Legionella can be prevented
   - Where an identified risk cannot be prevented, prepare, implement and manage a written control scheme (or course of action) for controlling the risk
   - Keep records and check that what has been done is effective
   - Ensure resources are made available to achieve compliance
   - Ensure all those personnel involved in the management of legionella risks are appropriately informed, instructed, and where necessary, trained and supervised
   - Promote an awareness within the wider College community of the hazards presented by legionella bacteria.

8. Infrequently Used Outlet, is a term used to describe a domestic water outlet that is not used at least once a week for a minimum period of two minutes e.g. emergency showers, toilets or sinks in redundant or little used parts of buildings.

Roles and Responsibilities

9. The Estates Department are responsible for managing and controlling Legionella bacteria in the College’s hot and cold domestic water system to the outlet/point of use.

10. Responsibility for managing and controlling Legionella risks in College Services starts at the outlet and extends to all department owned equipment containing water.

11. The diagram in Appendix 1 shows the Legionella management structure in simplified form for clarity.

12. In meeting its statutory obligations, the College has instituted the following organisational arrangements:

13. The Director of Estates is the designated ‘Duty Holder’ and has overall responsibility for implementing the requirements of this Policy, including:
   - Holding overall responsibility for all aspects of the quality and management of water supplies within the College’s buildings. This includes ensuring that the organisation and arrangements are set up to enable compliance with all relevant policies and procedures.
   - Appointing and ensuring the continued competency of the Responsible Person (and nominated Deputy) to assist them with the execution of their responsibilities. These should have has suitable ability, experience, training and resources to enable them to carry out the role.
   - Applying for such resources as are appropriate to discharge the College’s statutory obligations;
   - Reviewing the progress of legionella issues relevant to all projects with the Responsible Person on a regular basis.
14. **The Head of Maintenance Services** is the nominated ‘**Responsible Person**’ and is responsible for:
   - Implementing and maintaining the College’s planned preventative maintenance system for the control of Legionella bacteria within operational water distribution systems installed in College premises.
   - Ensuring that persons carrying out Legionella risk assessments, monitoring and remedial works to operational systems are suitably qualified and competent to do so.
   - Ensuring that records of risk assessments and precautions are maintained.
   - Putting in place arrangements for reporting an outbreak or suspected outbreak of Legionnaires disease.
   - Ensuring that the measures for monitoring and controlling the risks associated with Legionella are audited annually.
   - Preparing reports for the **Legionella/Water Management Review Group** on the efficacy of the control of Legionella management system.
   - Developing a Legionella **Written Control Scheme** specifying the various control measures and how to use and carry out those measures.
   - Ensuring that the requirements of this Policy are implemented and for drawing to the attention of the Director of Estates, any matters which may inhibit the execution of the Policy which lie outside of the post holder’s remit to resolve.
   - Ensuring legionella risk assessments are reviewed regularly for example when there is any significant change to the installation, a change to the use of the building, or the results of checks indicating that control measures are no longer effective.
   - Ensure procedures to manage risk are place and that actions identified from minimising the risk listed in the risk assessment, are reviewed, and actions undertaken accordingly and recorded.
   - Communicating information to the employees with regards to relevant information on the risks and control measures being undertaken to control Legionella bacteria.
   - Ensure that there is a clear and concise route for notification of positive samples and clarity on who decides remedial actions and who is responsible for carrying these out.
   - Monitor the performance of the preferred contactor and discuss deficiencies with the Head of Estates.
   - Review and implement reports and audits by the Health and Safety Department and Water Treatment Services Providers.
   - Chairing the **Legionella/Water Management Review Group**.

15. **Accountable Persons** are those persons given specific duties by the appointed Responsible Person for the control of Legionella risks in the water systems they are responsible for managing. For example Accountable Persons may be given the duty of flushing infrequently used outlets and maintaining a log.

16. **The Compliance Manager** is the nominated ‘**Deputy Responsible Person**’ and is responsible for:
   - The duties of the ‘Responsible Person’ in the post holder’s absence;
   - Reporting to the Health and Safety Consultative Committee on precautions to reduce the risks of exposure to legionella.
   - Appointing suitably qualified Water Treatment Services Providers to manage the necessary procedures for the prevention and control of Legionella.
   - Advising the Responsible Person of any changes or items for concern in their area.
   - Carrying out audits to ensure all risk assessments are in place, completed and comply with current regulations.
   - Reviewing the risk assessments and control measure whenever there is a reason to suspect they are no longer valid.
   - Ensuring immediate action in response to notification of positive samples (out of specification results) and for the implementation of remedial actions.
   - Ensuring that all scheduled control measures are in place and effective.
   - Ensuring water systems operate under the conditions detailed in the Legionella **Written Control Scheme**.
   - Ensuring that all planned maintenance work and planned remedial works undertaken is carried out on time, to specification and are recorded.

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The ‘Responsible Person’ is defined as being someone with day-to-day responsibility for controlling any identified risk from Legionella bacteria. The appointed ‘Responsible Person’ should be a manager, director, or have similar status and sufficient authority, competence and knowledge of the installation to ensure that all operational procedures are carried out in a timely and effective manner. They should also have a clear understanding of their duties and the overall health and safety management structure and policy in the organisation.
Creating work orders and raising notifications for remedial works.

Checking that the Legionella Written Control Scheme i.e. all schematic diagrams, risk assessments and analytical testing schedules are updated, whenever there has been any modifications or changes to existing installations, or when remedial action has been taken including control scheme reviews.

17. The Head of Projects is responsible for:
- Ensuring that all Estates-related works comply with the requirements of this Policy and that all project briefs, tendering documents, and budgets ensure that the required information, process and procedure required by this document can be met.

18. Estates Project Managers are responsible for complying with the requirements of this Policy and for ensuring that all required project management information, amendments, and updated information is gathered in the required format, and is passed to the Responsible Person in a timely manner, including:
- Checking that designers and installers comply with 'The Water Supply (water Fittings) Regulations 1999' and with BS EN 806 (Parts 1-5) 'Specifications for installations inside buildings conveying water for human consumption'.
- Obtaining a completed Legionella Commissioning Checklist from the installer, reviewed and signed off in conjunction with the designer.
- Obtaining from the designer completed drawings, Legionella risk assessment and testing schedules for all new water systems.
- Ensuring that when conducting any modification or changes to existing installations all associated drawings, risk assessments and testing schedules are updated and forwarded to the Responsible Person.

19. Heads of Department (and Head of Residences, Head of Conference and Catering, and Technical Operations Managers) are responsible for:
- Ensuring compliance with the College Legionella Management policy and Legionella Approved Code of Practice (ACOP L8).
- Ensuring department owned equipment that contains water and which is temporarily or permanently connected to the domestic water system has been risk assessed, and that suitable controls have been implemented to minimise the risk of exposure to Legionella bacteria. Where a work activity involves equipment that stores or uses water there must be suitable arrangements in place to undertake a risk assessment and identify and eliminate or, where this is not reasonably practicable, adequately control any risk from exposure to legionella bacteria arising out of the use of that equipment. Where the activity takes place on College premises, the Responsible Person under this policy must be consulted so that the building water system risk assessment and other documentation can be reviewed if necessary. Where a risk from exposure to legionella bacteria arising from the use of equipment has been identified, there must be suitable and sufficient arrangements in place for undertaking and recording the maintenance, disinfection, cleaning and monitoring of the equipment by the owner.
- Ensuring all department owned equipment that contains water under their control is tested, inspected and monitored for the presence of Legionella, and that all necessary remedial works are carried out as required.
- Ensuring that all infrequently used water systems e.g. emergency showers, toilet and bathroom facilities, eye wash stations and other water systems as identified by risk assessment, are regularly flushed in accordance with procedures to control risks arising from stagnant water. Ensure suitable records of the flushing regime are maintained on site.
- Ensuring that no alterations or additions to water systems are carried out without the approval of the Head of Maintenance Services (Estates).

20. The Compliance Monitoring Team is responsible for maintaining the College’s on-line Legionella management database, including:
- Examining the test results from the Legionella monitoring programme;
- Identifying all recorded defects (including temperatures out-with the required parameters) and ensuring these are communicated to the person responsible for rectification;
- Keeping records of all such defects and actions taken to rectify them.
21. **The Director of Health and Safety** is responsible for:
   - The provision of advice and guidance on the application of the legislative requirements;
   - Where necessary, liaising with the enforcement authorities;
   - Ensuring that Legionella-related incidents are appropriately investigated and, where necessary, reported under RIDDOR;
   - Monitoring compliance with the requirements of this Policy.

22. **The Water Hygiene Services Provider** is appointed by the ‘Responsible Person’ and is responsible for:
   - Delivering a comprehensive water hygiene and control of Legionella bacteria service to ensure the College complies with the Legionella Approved Code of Practice (ACOP L8)
   - Carrying out routine testing, monitoring, flushing and cleaning of all systems on a regular basis as agreed in the contract specification.
   - Updating all existing risk assessments as required under the contract.
   - Providing a water hygiene and control of Legionella bacteria records management system which complies with the regulations and Legionella Approved Code of Practice (ACOP L8)
   - Agreeing and implementing prioritised corrective actions with the Responsible Person;
   - Attending monthly meetings with the Deputy Responsible Person to report progress and highlight any concerns.

**Identification and Assessment of the Risk**

23. The College will employ suitably qualified and competent persons to carry out a risk assessment of every building. The assessment will comply with the BS 8580 2010 Water Quality, Risk Assessments for Legionella Control, Code of Practice and the HSE publication ‘Legionnaires’ disease: The control of Legionella bacteria in water systems, Legionella Approved Code of Practice (ACOP L8)’.

24. Reviews of risk assessments will take place when:
   - There are changes to the water system or its use;
   - There are changes to the use of the building in which the water system is installed;
   - New information about risks or control measures becomes available;
   - The results of checks indicating that control measures are no longer effective;
   - A case of legionnaires’ disease/Legionellosis is associated with the system.

25. In new buildings, the Estates Department should ensure that who-ever designs, manufactures, imports or supplies water systems, that may create a risk of exposure to Legionella bacteria, so far as reasonably practicable;
   a) The water system is so designed and constructed that it will be safe and without risks to health, when used at work;
   b) Provide adequate information for the user about the risk and measures necessary to ensure that the water systems will be safe and without risks to health when used at work.

26. This will take the form of a risk assessment which will be provided on completion of works or at handover.

**Controlling and Monitoring the Risk**

27. The College will employ suitably qualified and competent persons to implement a control and monitoring scheme for all potential sources of risk.

28. The company employed will carry out assessment; monitoring and control as a member of an accredited body i.e. The Legionella Control Association.

29. Maintenance Services will operate an electronic water management system logbook for each building, which will contain records of all monitoring checks and the control measures to be adopted. The electronic system will be maintained by the Compliance team.
30. The College schools, services and departments will ensure that departmental equipment is serviced (to include inspection, cleaning and disinfection) and maintained to the standard required to control Legionella bacteria within the College.

31. Individual College departments will ensure records of servicing and maintenance of equipment are retained, along with a log detailing flushing regimes (see Appendix 2).

32. Audits of the management system and associated records will be carried out annually by the current water hygiene service provider.

33. The College adopts a temperature and biocide treatment regime for Legionella control in water systems. Where historically problems have been encountered in maintaining temperature control, and the cost prohibits an engineered solution, the additional control measure of biocide treatment in the form of Chlorine dioxide dosing plant is used and biocide levels are monitored.

34. College departments must maintain and keep records of flushing regimes for infrequently used outlets e.g. during holiday periods.

Training and Competence

35. All appropriate staff will receive training and instruction commensurate with their level of responsibility where necessary from accredited training providers. Members of the Estates Department staff, or other staff who are required to undertake duties which may bring them into contact with potential sources of infection, shall receive such information, instruction and training as required by the Responsible Person, based on the findings of the risk assessment. Legionella awareness training will be provided at least bi-annually or when there have been changes to the relevant legislation.

36. The content of the training will include familiarisation of the risks associated with legionella, safe operating procedures and the use of personal protective equipment.

37. The Responsible Person will identify appropriate levels of information, instruction and training for duty holders identified in this Policy.

38. Refresher training will be provided in accordance with departmental training requirements.

The Legionella Written Control Scheme

39. The Legionella Written Control Scheme is a water management system which is set up to control the risk of exposure to legionella bacteria in the system. The scheme will specify the various control measures and how to use and carry out those measures. It will also describe the water treatment regimes and the correct operation of the water system plant. It will include the following information:
   ▪ Risk assessment information.
   ▪ A schematic drawing showing the layout of the water systems and their location within and around the premises.
   ▪ The correct and safe operation of the system.
   ▪ Precautions in place to prevent or minimize risk associated with the system.
   ▪ Analytical tests, other operational checks, inspections and calibrations to be carried out, their frequency, and any resulting corrective actions.
   ▪ Remedial action to be taken in the event that the scheme is shown not to be effective, including control scheme reviews and any modifications made.
   ▪ Health and safety information including details on biocide, storage, handling, use and disposal of any disinfectant used in both the treatment of the system and testing of the system water.
   ▪ Incident plan which covers the following situations:
     ▪ major plant failure e.g. chemical system failure
     ▪ very high levels or repeat positive water analyses for legionella
40. The Incident Management Plan and execution of the following situations, is the responsibility of the Business Continuity Process, managed by the Senior Management Team:

- an outbreak of Legionellosis, suspected or confirmed as being centred at the site
- an outbreak of Legionellosis the exact source of which has yet to be confirmed, but which is believed to be centred in an area which includes the site.

41. All of the College’s academic, administrative and accommodation buildings have been subject to a Legionella Survey which was completed in 2012.

42. This was undertaken to meet the requirements contained in the Legionella Approved Code of Practice (L8). The survey includes records showing the details of the plumbing installations within each building, and there is an up to date schematic diagram showing the layout of the water systems and their location within and around the premises. From this information, a risk assessed, prioritised schedule of essential remedial works has been produced.

43. The results of the survey are contained in the College Legionella Management Register, which is stored electronically on the Estates Department Electronic Recording system, and presented building-by-building. The information is held and maintained under the direct supervision of the Responsible Person.

44. The electronic management system will hold the following information:

- Temperature checks are carried out once a month at sentinel water points and 10% of all water outlets in every building across the site and the results recorded on Aqua-log.
- Risk Assessment for the system
- Schematic diagrams of the system
- Records of control checks taken
- Chlorination record certificates
- Records of any remedial work carried out
- Programme of monitoring
- A written scheme for controlling the risk of exposure to Legionella
- COSHH data regarding any chemicals used for dosing water systems

45. The Compliance Team and the Estates/Maintenance Team, shall manage the electronic management system on a day to day basis.

The Legionella Water Management Plan

46. In order to ensure the effective management of the risk presented by legionella, together with the need to maintain functional integrity of both hot and cold water systems, including storage, the College operates a Legionella Management Plan.

47. The plan is a prioritised schedule of works developed from the risk assessments conducted of the College’s water systems, and has been developed from the legionella surveys undertaken, the latest having taken place in 2012. From the results of these, the Legionella Manager has developed a risk-assessed priority listing of works to be undertaken.

48. The risk assessed programme of works is developed by the Legionella Manager at the annual budget setting process. Full details of each annual programme of works dating back to 2004 are held in the legionella written control scheme.

Legionella Management Review Group

49. The Legionella Management Review Group will meet at least annually and will comprise of the following members of College staff:

- The Responsible Person (Chair)
- The Deputy Responsible Person (Secretary)
The Director of Estates
The Director of Health and Safety
The Head of Projects (Estates)

50. The Responsible Person will present his formal report of the proceeding twelve months, which will include a review of the legionella management work undertaken (including risk assessments and the written control scheme) and put forward recommendations for the Group to consider or approve.

51. The purpose of the Group will be to review, on behalf of the College, that the Estates Department is taking all appropriate measures to meet the requirements of this Policy and relevant legislation.

Legionella Management Audit

52. In addition to ongoing monitoring conducted by the Responsible Person, compliance with the requirements of this Policy will be reviewed by members of the College Health and Safety Office during the health and safety audit process.

53. This Policy forms part of the College Health and Safety Policy.

Elaine Cassidy
Health and Safety Officer (Auditor)
Version 4

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