



SMARDEN PRIMARY SCHOOL

'Enjoying, Learning and Achieving Together'

Legionella Policy

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1. Introduction

Schools, like all places of work, are required by law to have in place a sound procedure for managing the risk of legionella. Although comparatively rare, the HSE records that: "On average there are approximately 200-250 reported cases of legionnaires' disease every year in the UK. Legionnaires' disease is a "Notifiable Disease" that must by law be reported to the Health and Safety Executive (HSE) and the Health Protection Agency (HPA). This may result in the temporary closure of all, or part of a school.

Smarden Primary School is committed to the health and safety of our staff, pupils and visitors. Ensuring the safety of our school community is of paramount importance to us, and this policy reflects our dedication to creating a safe learning environment.

This policy has been created to ensure the school is in compliance with all legislative requirements with regard to the control of legionella in water systems for all employees and pupils. The Health and Safety at Work etc. Act 1974 and The Management of Health and Safety at Work Regulations 1999 (as amended), in addition to the Care Standards Act 2000, provide the legislative basis for this policy.

In addition, this policy highlights our arrangements to extend good practice, as far as is reasonably practicable, to all others affected by our activities.

2. Background

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 20°C and 45°C but can be killed by elevated temperatures or chemical treatment methods. Control is commonly achieved through suitable maintenance of the water system and its plant. Water storage procedures, preventing the bacteria from proliferating, also provide additional control. Those at high risk of infection include: those over 45 years of age, smokers, heavy drinkers, those suffering from chronic respiratory or kidney disease and those with impaired immune systems.

3. Responsibilities

The overall responsibility for the safety of all members of the school community lies with the Board of Directors of The Kemnal Academies Trust (TKAT).

The Head Teacher is ultimately responsible for the day-to-day implementation of this policy, namely to:

- Prepare and implement a written scheme for preventing and controlling the risk of legionella
- Implement and manage the scheme
- Ensure appropriate training is provided

- Ensure that the testing and flushing of water outlets is carried out as outlined in appendix one
- Ensure a legionella risk assessment is carried out
- Keep records of all flushing, testing, disinfection procedures and certification for a minimum of five years.

However, this responsibility may be delegated to a member of staff. Under our policy, this responsibility is delegated to the Business Manager. Day to day responsibility for monitoring and ensuring that the systems are being correctly operated, lies with the Caretaker.

4. Procedure

The Caretaker is responsible for the recording and implementation of the Legionella control measures. He maintains appropriate records of testing and certification.

4.1 Risk Assessment

Smarden Primary school has employed Envirocure, a firm of water safety specialists to prepare a Legionella Risk Assessment with control scheme guidance for all the school buildings.

The Risk Assessment outlines all of the hot and cold water systems, calorifiers, pipe work, taps and showers in the buildings.

The Risk Assessment identifies and assesses the main sources of risk in the school, taking account of:

- Water temperature
- Potential for water stagnation in long pipe runs and “dead legs” or infrequently used taps and showers
- Potential for aerosol formation, especially in showers and drinking water fountains
- Condition of the water throughout the premises
- The use of thermostatic mixing valves (in order to avoid scalding) that potentially set a favourable outlet temperature for legionella growth
- Signs of debris in the system, such as rust, sludge or scale that could provide food for growing legionella
- Condition of the pipe work, plant, tanks etc.

The Risk Assessment is reviewed and updated annually, or each time that a new measure is introduced.

Following each risk assessment, the school must ensure that all recommended actions are carried out within a timely manner, focussing on highest priority areas first.

4.2 Preventative Measures

The caretaker has been trained in the need for legionella prevention measures. He is tasked with carrying out the following regular water checks (all of which are recorded in the water manual) in order to maintain good water hygiene:

Taps:

- Any cold tap that has not been used within a seven day period is flushed for 2 minutes on a weekly basis (avoiding splashing so as to minimise the creation of an aerosol)
- Any hot water tap that has not been used within a seven day period is similarly flushed for at least 5 minutes, or until the temperature reaches 60 degrees C on a weekly basis and before the water is used
- Monthly temperature checks to hot water are conducted by inserting a thermometer in the outflow of the first and last tap of each circulation system for the required period and recording the temperature.
- Monthly temperature checks are carried out to the first and last cold water taps in order to ensure that they operate at below 20c after running for 2 minutes.

All temperature readings are recorded. Should the cold water exceed 20 degrees C after running for 2 minutes, the caretaker should inform the Business Manager who will then contact HBE.

Showers:

- Any shower (whether heated directly by an instant water heater or through mains hot water) that is not used within a seven day period is flushed through for 2 minutes. Minimising the creation of an aerosol is achieved by placing a plastic sack or similar, over the shower head or by removing the shower head and placing the hose directly over drain outlet.
- Shower heads and hoses are dismantled and descaled quarterly.

Toilets

- Any toilet that is not used within a seven day period is flushed each week, and the flushing mechanism on urinals checked.

Calorifiers / Hot Water Tanks

- The water temperature leaving and returning to the calorifiers/ hot water tanks is inspected on a monthly basis.
- The calorifiers / hot water tanks are inspected annually.
- This inspection includes all associated pipework and insulation where applicable.

Hot Water Systems

- Hot water systems that are shut off for the holidays must be heated to 60 degrees C, and then kept at that temperature for at least one hour in order to kill all bacteria.

- The caretaker will then flush the system before use.

Cold Water Systems

- All cold water systems that are unused during the holidays are also thoroughly flushed through before use by the caretaker.

Cleaning

- The cleaner is responsible for ensuring that all water outlets are regularly descaled regularly and that this is recorded in the Log Book.

5. External Control Services

Smarden employs external contractors to help us to manage water safety, as detailed below:

- The air conditioning equipment is serviced annually.
- The boiler is serviced annually.
- The calorifiers / hot water tanks are checked annually and descaled when necessary.

6. Water Sampling

An accredited Water Consultant will conduct the following sampling and analysis of our water supplies if temperatures at an outlet continue to stay within the range where Legionella would thrive: The Water Consultant will test the outlet in question and any adjoining outlets and the source (or as close to where the water enters the building in the case of cold taps).

7. Records

Records are kept in the Water Control Scheme Log Book of all water system checks.

The manual is kept in the main school office.

8. Staff Training

The caretaker has been trained to record and implement legionella control measures and all training certificates are kept with the Water Control Scheme Log Book.

9. Incident reporting

The Water Consultant will notify the caretaker immediately if a water sample is contaminated, including details of the contamination and remedial measures.

The Business Manager will be responsible for informing the Head Teacher who will report the incident to the TKAT nominated health and safety officer as outlined by the Health and Safety Executive (HSE). The notification will cover:

- Details of the sample
- The organism present in the sample
- Location
- Advice on appropriate remedial measures. If a member of the school community is taken ill following exposure to legionella, the chair of governors will be notified immediately.

9.1 Reporting procedure

Should an incident require reporting to the Incident Contact Centre (part of the HSE) the Business Manager will submit a RIDDOR report on the Every reporting system as soon as possible.

9.2 Incident 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 assessment amended, to avoid reoccurrence.