

CONTROL OF LEGIONELLA POLICY
incorporating Written Control Scheme

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CONTROL OF LEGIONELLA POLICY

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1. INTRODUCTION

- 1.1 The college has a statutory duty to assess and manage all hot and cold water systems in all buildings under its control. This is to ensure that risks from legionella and other bacteria are effectively managed. This policy details how the risks will be managed.
- 1.2 Risks are typically controlled by ensuring cold and hot water is circulated within appropriate temperature ranges, to routinely run infrequently used taps and descaling shower heads and similar fittings.
- 1.3 Water sampling is to be undertaken at periods detailed in the water risk assessment to determine if the risk controls measures are working or if they need to be reviewed.

2. SCOPE

- 2.1 The policy applies to all water systems from the entry point of mains water into the college. The water system includes any pipe, tank, calorifier, shower, heat exchanger, tap, cistern or any other item in which water flows through it or is stored within it.

3. LEGISLATION AND GUIDANCE

- 3.1 The following legislation and guidance are relevant:
 - HSW Act 1974
 - Management of Health and Safety at Work Regulations 1999
 - C.O.S.H.H. Regulations 2002
 - HSE A.C.O.P. L8 entitled “Legionnaires disease – the control of legionella bacteria in water systems” (fourth edition) 2013
 - HSE publication entitled “Legionnaires Disease – Technical Guidance HSG 274 (second edition)
 - HSE publication entitled “Legionnaires disease: a brief guide for duty holders”

4. RISK ASSESSMENT

- 4.1 The college will engage a competent contractor to undertake a comprehensive risk assessment of all hot and cold water systems.
- 4.2 The risk assessment will detail all the control measures which need to be in place and set out specific details of all routine and non-routine actions as part of the control measures.
- 4.3 The risk assessment will be documented and include:
 - Details of the risks and control measures.
 - Competency evidence of the contractor.
 - Schedule of works and defects log.

- Infrequently use outlet flushing records.
- Clean and disinfection records.
- Sentinel outlet temperature monitoring records.
- Clean and disinfection records.
- Cold water storage tank, calorifier, water heater inspection records.
- Legionella and bacteriological results.
- Method statements.
- Dynamic point of use risk assessments.
- COSHH documentation.
- Miscellaneous information including Waltham Forest College staff training records.

4.4 The risk assessment will be reviewed every two years unless there are significant changes to the hot and cold water services or if it is apparent that the risk assessment needs to be revised due to inadequate control arrangements.

5. RESPONSIBILITIES

5.1 The Duty Holder

5.2 The Duty Holder is the Principal and Chief Executive Officer.

5.3 The Duty Holder is the person who ultimately ensures that appropriate arrangements and resources are in place for the effective management and control of water hygiene risks.

5.4 The Responsible Person

5.5 The Responsible Person is the Head of Estates.

5.6 The Head of Estates will ensure:

- A competent contractor is engaged to produce a control of legionella risk assessment and that the risk assessment is reviewed as recommended by the competent contractor.
- Control measures as detailed in the risk assessment, are implemented and undertaken according to the schedules detailed in the risk assessment.
- Appropriate records are kept of actions undertaken by Estates staff including the flushing of little used water outlets and water temperature checks.
- Appropriate records are kept of activities undertaken by the competent contractor.
- Staff undertaking routine activities such as monitoring water temperatures or flushing infrequently used outlets, are competent to take the activity and appreciate the importance of them.

- Guidance is sought from the competent contractor on corrective or improvements actions if water sampling indicates unsatisfactory levels of legionella or other bacteria.
- The competent contractor is informed of any changes to the hot and cold water services which would require the risk assessment to be reviewed or revised.

5.7 The Deputy Responsible Person

5.8 The Deputy Responsible Person will act as the Responsible Person in their absence.

5.9 The Deputy Responsible Person is the Health and Safety Manager.

5.10 The Health and Safety Manager

5.11 In addition to acting as the Deputy Responsible person, the Health and Safety Manager will:

- Draft and maintain a Written Scheme of Control which sets out in detail the arrangements for managing risks, responsibilities and actions to take should there be an incident related to the water systems e.g. significant amount of legionella bacteria in the systems. The Scheme will meet the criteria set out in HSG 274.
- Ensure risk assessments are documented and disseminated for the activities undertaken by Estates staff.
- Carry out any other monthly compliance checks to ensure any necessary actions are implemented and completed within appropriate timescales.
- Ensure the risk assessment is reviewed within recommended time limits.
- Support the Head of Estates in implementing incident response actions should the need arise.
- Provide the Director of Estates, Projects and Sustainability details of compliance status each month and to highlight any significant concerns.

6.0 THE WRITTEN SCHEME OF CONTROL

6.1 The Written Scheme of Control is shown as Appendix 1 in this Policy document.

APPENDIX 1

LEGIONELLA WRITTEN CONTROL SCHEME

(to be read in conjunction with the Control of Legionella Policy)

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1. PURPOSE AND SCOPE OF THE WRITTEN CONTROL SCHEME

A written control scheme for legionella details how risks will be managed. This written scheme applies to the whole college campus. In order to achieve control over the entire water system and maintain a suitable schedule of controls, the written scheme clearly identifies:

- The measures required to control the risks from exposure to legionella bacteria.
- How those measures are implemented and managed.
- Who is responsible for their implementation, so that control over the entire water system is achieved and remains effective.
- An Incident Plan.
- The written scheme of control is set out as recommended in HSE publication entitled "Legionnaires Disease – Technical Guidance HSG 274 (second edition)".

2. RISK ASSESSMENT

The risk assessment identifies the risks associated with the hot and cold water services and records the usual actions which are necessary to control and manage the risks.

The risk assessment is undertaken and documented by a competent contractor. The risk assessment will be reviewed at a period recommended by the contractor or sooner if there are any incidents concerning the hot or cold water services or if there have been significant changes to the hot and cold water services.

3. MANAGEMENT STRUCTURE AND RESPONSIBILITIES

The Duty Holder is the Principal and CEO.

The Duty Holder will:

- Nominate and appoint a Responsible Person and Deputy to assist with the completion of preventive legionella controls.
- Allocate appropriate financial and other resources for the control of legionella.
- Provide the Responsible Person with sufficient authority and support to ensure that all operational procedures are carried out in a timely and effective manner.

The Responsible Person

The Responsible Person is the Head of Estates.

The Responsible person will:

- Ensure all control measures are carried out in a timely and effective manner, and results are recorded.
- Periodically review legionella records to ensure there are no gaps or unaddressed issues.
- Report any issues highlighted during implementation to the duty holder.
- Periodically review this document.
- Review recommendations from the legionella risk assessment and complete in a timely manner.
- Receive training in order for them to fully understand their duties and responsibilities and to be able to implement the control measures.

The Deputy Responsible Person

The Deputy Responsible person is the Health and Safety Manager.

The Deputy Responsible person will:

- Support the Responsible Person with their duties.
- Carry out control measures in the responsible person's absence.
- Receive training in order for them to fully understand their duties and responsibilities and to be able to implement the control measures.

4. OPERATION OF THE WATER SYSTEMS INCLUDING OPERATIONAL CHECKS AND INSPECTIONS

The water system should operate within the following parameters:

- Cold Water Storage Tanks (CWST): 20°C (Maximum).

- Cold water outlets: 20°C (Maximum).
- Hot Water Storage Units (HWS) (above 15 litres): Flow 60°C (Minimum) 65°C (Maximum).
- Hot water outlets: 50°C (Minimum).
- Hot water return: 50°C (Minimum).
- Point of Use water heaters (less than or equal to 15 litres): 50°C (Minimum) at an outlet.
- Combination Boilers: 50°C (Minimum) at an outlet.
- Instantaneous Water Heaters: 50°C (Maximum) at an outlet.
- Hot water outlets with blending valves set to 39-43°C as appropriate. Valves to be serviced twice per annum.
- All outlets not used at least weekly to be flushed on a weekly basis.
- Expansion Vessels to be flushed through and purged to drain.

Legionella monitoring will be carried out where there is doubt about the efficacy of the control regime or where recommended temperatures are not being consistently achieved throughout the system.

The following operational controls shown below are detailed in the risk assessment.

Hot Water Storage Units (HWS)

- Check flow and return temperatures.
- Inspect HWS internally by removing the inspection hatch or using a boroscope and clean by draining the vessel. (Contractor)
- Where there is no inspection hatch, purge any debris in the base of the HWS to a suitable drain. (Contractor)

Cold Water Storage Tanks (CWST)

- Inspect CWST annually. This should be carried out by a competent person.
- Take the appropriate temperatures readings.

Sentinel Points

- Take temperatures at hot and cold sentinel points.

Representative Points

- Take temperatures at a representative selection of other hot and cold points within the water system.

Showers

- Dismantle, clean and descale removable parts, heads, inserts and hoses.
- Remove the showerhead from the hose.
- Take apart the showerhead.
- Put the parts from the showerhead and the hose in a sink/bucket and soak in hot water with an appropriate showerhead cleaner.
- Use a brush to remove stubborn residue.

- Rinse all parts thoroughly with clean water.
- Dry with a clean towel and leave to dry.
- Reassemble the showerhead and attach it to the hose.

If shower heads and hoses cannot be cleaned or descaled effectively, they should be replaced.

Infrequently used outlets

- Consideration will be given to removing infrequently used showers, taps and any associated equipment that uses water, including redundant supply pipework.
- Little used outlets within a water system are included on the flushing regime with records of flushing kept. These outlets are identified in the risk assessment.
- Flush the outlets until the temperature at the outlet stabilises and is comparable to supply water.

Dead Legs/Dead Ends

- Dead legs are lengths of pipework which are no longer used, or used extremely rarely, but can be drained. These have been removed where possible and those that remain are included in the weekly flushing schedule.

5. LOCATIONS OF ASSETS AND SUMMARY OF CONTROL MEASURES

Assets	Location	Actions (frequency)
Location of mains inlet	<i>See Risk Assessment</i>	<i>Check temperature of stored water and incoming mains water (annually, summer)</i>
Location of cold water storage tanks on site:	<i>See Risk Assessment</i>	<i>Inspect tank annually (Contractor, annually) Check temperature of stored water and incoming mains water (annually, summer)</i>
Locations of water boilers:	<i>See Risk Assessment</i>	<i>Update as required</i>
Locations of sentinel points on site:	<i>See Risk Assessment</i>	<i>Hot outlets without TMVs should operate at 50 °C or higher (Monthly). Outlets with TMVs should be between 39-43 °C. The hot pipe before the TMV should be at least 50 °C.</i>

Assets	Location	Actions (frequency)
		<i>All POU heaters should operate between 50 and 60 °C. All cold outlets should be below 20 °C within 2 minutes of running the tap</i>
Location of “shower/sprinkler” style outlets:	<i>See Risk Assessment</i>	<i>e.g. Flushed directly down drain weekly Dismantled, descaled, and sterilised with Milton quarterly</i>
Location of infrequently used outlets:	<i>See Risk Assessment</i>	<i>(Flush for at least two minutes, and until water temperature has dropped below 20 °C)</i>
Location of TMVs:	<i>See Risk Assessment</i>	<i>e.g. Maintained by service provider and failsafe checked annually</i>
All outlets following College closures	<i>See Risk Assessment</i>	<i>e.g. Outlets flushed until they reach the appropriate temperatures.</i>
Sampling of the system	<i>e.g. in line with recommendations made in the legionella risk assessment, samples are taken for lab testing.</i>	<i>e.g. Results of sampling are recorded in the risk assessment folder. In the event of positive samples, guidance on actions to take should be sought from the competent contractor.</i>

6. REMEDIAL ACTIONS IF THE SCHEME IS SHOWN TO BE INEFFECTIVE

Remedial actions may be necessary if there are repeated positive legionella samples. Guidance should be sought from the competent contractor. Typical actions are shown below:

Results <100 cfu/l	Continue with current control measures.
Results >100 cfu/l and up to 1000 if the minority of samples are positive.	The system should be resampled. If similar results are found again, a review of the control measures and risk assessment should be carried out to identify any remedial actions necessary.
Results >100 cfu/l and up to 1000 if the majority of sample results are positive.	The system may be colonised, albeit at a low level. An immediate review of the control measures and risk assessment should be carried out to identify any other remedial action

	required. Disinfection of the system should be considered.
Results>1000	The system should be re-sampled and an immediate review of the control measures and risk assessment carried out to identify any remedial actions, including possible disinfection of the system. Retesting should take place a few days after disinfection and at frequent intervals afterwards until a satisfactory level of control is achieved.

7. HEALTH AND SAFETY INFORMATION (use of disinfectants etc.)

Disinfectants may only be used by the competent contractor and the whole hot and cold water services must be left in a safe state after any disinfections. Disinfections must be carried out in such a way that there are no risks to any college user.

8. INCIDENT PLAN

The Aims of the Plan

If very high microbiological activity is identified or if there is an outbreak of legionellosis, the incident plan will be instigated. The aims of the plan are to control risks to all college users, to implement and monitor remedial actions, to ensure the risk assessment is reviewed and actions are taken to prevent a recurrence and that, if necessary, the HSE are informed.

Remedial Actions

The following remedial actions might be necessary which will be dependant, on the significance of the incident and where or how the incident occurred:

- Disinfecting the systems in accordance with BS EN806.
- Increasing or decreasing water temperatures.
- Removal/replacement of shower head type sprinklers.
- Preventing admittance to certain areas/facilities.
- Taking water samples in accordance with BS 7592.

Responsibilities and Duties of the Responsible Person (Head of Estates)

The Responsible Person will:

- Immediately seek guidance from the competent contractor and implement immediate actions. The actions should aim to prevent any college user being put at risk.
- Inform the Duty Holder and advise them on the actions which need to be taken and by whom.
- Seek support from the Deputy Responsible Person and if necessary, from the Director of Estates, Projects and Sustainability.

- Routinely update the Duty Holder, the Director of Estates, Projects and Sustainability, the Deputy Principal Finance and Resources and the Health and Safety Manager on the progress and success of the remedial actions.
- Ensure the risk assessment is reviewed and revised so that any inadequacies or issues identified through the incident are appropriately addressed to prevent a recurrence.

Responsibilities and Duties of the Competent Contractor

The competent contractor will:

- Provide advice and guidance on the most effective actions to take to manage the incident.
- Undertake all necessary actions without delay.
- Provide evidence of the success or not of the actions taken.
- Review and revise the risk assessment to prevent a recurrence of the incident.

Responsibilities and Duties of the Deputy Responsible Person

The Deputy Responsible Person (Health and Safety Manager) will:

- Report any cases of legionellosis to the HSE and be the main point of contact during any investigation by them.
- Ensure an incident log is maintained to record the main actions taken and key details of meetings and conversations with the competent contractor.
- Assist the Responsible Person as necessary.
- Review the Incident Plan once the incident has been remedied to see if any improvements need to be made to it.

Responsibilities of the Director of Estates, Projects and Sustainability

The Deputy Responsible Person (Health and Safety Manager) will:

- Support the Responsible Person and Deputy Responsible Person in order that they may complete their actions.
- Draft, if necessary, communications to staff and students.
- If necessary, seek additional resources from the Deputy Principal, Finance and Resources.

The Duty Holder (the Principal and CEO)

The Duty Holder will ensure:

- Sufficient resources are available to manage the incident to a satisfactory conclusion.
- Appropriate communications are sent to staff and students.

- Assurances are received from the competent contractor that the risk assessment has been reviewed and that all reasonable actions have been taken to prevent a recurrence.
- That appropriate resources will be provided to prevent a recurrence.