



EQUA
Multi Academy Trust

All Cannings Primary School



Legionella Policy Annex: Arrangements for All Cannings Primary School

Version Control

Approved on	21/03/2023	
Approved by	Full Governing Body	
Review Period	Three years	
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Chair of Governors	Pamela Moscrop	
Headteacher	Richard Borman	

These arrangements are specific to each school and will help to ensure that the aims and objectives of the Trust's Legionella Policy are implemented.

Legionella Written Scheme of Control

Aim

It is a Control of Substances Hazardous to Health 2002 (COSHH 2002) and a Management of Health & Safety at Work Regulations 1999 (MHSWR 1999) requirement that employers ensure that any control measures are properly applied and employees are provided with suitable and sufficient information, instruction and training. A written scheme of control should be devised and implemented (as stated in the Approved Code Of Practice L8) to design, maintain and operate the water services under conditions that prevent or control the growth and multiplication of legionella bacteria.

Policy Statement

All Cannings CE Primary School acknowledges and accepts its responsibilities under the legislation and statutory guidance listed in the Equa MAT Legionella Policy. The School will take all reasonable precautions to prevent risk to health from exposure to legionellosis by implementing the appropriate control measures in all of its relevant buildings.

Written Scheme Review

This written scheme will be subject to review every 3 years or as necessary in line with any risk assessment findings.

What is Legionnaires Disease?

Legionnaires' disease is an uncommon form of pneumonia caused by the legionella bacterium. The majority of cases reported are as single (isolated) cases but outbreaks can occur. All ages may be affected but the disease mainly affects people over 50 years of age, and generally men more than women. Smokers and the immunocompromised are at a higher risk.

The early symptoms of Legionnaires' disease include a 'flu-like' illness with muscle aches, tiredness, headaches, dry cough and fever. Sometimes diarrhoea occurs and confusion may develop. Deaths occur in 10- 15% of the

general population and may be higher in some groups of patients. The incubation period can range from 2 to 19 days with a median of 6 to 7 days after exposure.

Infection occurs when people inhale legionella bacteria that have been released into the air in aerosolised form from a contaminated source. Once in the lungs the bacteria multiply and cause either pneumonia or a less serious flu like illness (Pontiac fever).

The bacteria are widely distributed in the environment. They can live in all types of water including both natural sources such as rivers and streams, and artificial water sources such as water towers associated with cooling systems, hot and cold water systems and spa pools. They only become a risk to health when the temperature allows the legionellae to grow rapidly, such as in water systems of poor design or installation or when poorly maintained.

Control and prevention of the disease is through treatment of the source of the infection, i.e. by treating the contaminated water systems, and good design and maintenance to prevent growth in the first place.

1. Management structure for the control of Legionella

Lines of responsibility for the control of Legionella within the school:

Duty Holder	Board of Trustees	Equa Multi Academy Trust
Responsible Person	Richard Borman	Headteacher, All Cannings Primary School
Competent Person	Jackie Whittaker	Finance & Admin Officer, All Cannings Primary School

LEGIONELLA CONTROL CONTRACTOR	
Company:	Prime Compliance Services
Contact:	Mark David
Position:	Director
Contact Number:	07724 191409
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Tasks Assigned:	Risk Assessment Servicing of TMVs Training Consultancy

Staff will be properly trained and competent to carry out the appropriate measures, and the School shall facilitate such training as is necessary. No changes to this written scheme or its procedures shall be made without the agreement of the responsible person.

2. Management responsibilities and staff functions

2.1 The Duty Holder

The duty holder is the owner, occupier, employer or other person ultimately accountable and on whom the duty falls for the safe operation of the School. In the case of All Cannings CE Primary School, this is the Board of Trustees, Equa M.A.T. Their responsibilities are outlined in the Equa MAT Legionella Policy

2.2 The Responsible Person

The responsible person is formally appointed by the duty holder to be managerially responsible for the School's overall legionella management system. The nominated person must be a manager and have sufficient authority to ensure that all operational procedures are carried out in an effective and timely manner. The Responsible Person for All Cannings Primary School is Mr Richard Borman, Headteacher. The responsibilities of the Responsible person are outlined in the Equa MAT Legionella Policy.

2.3 The Competent Person

The competent person will be appointed by the Responsible Person and will be delegated responsibilities as outlined in the Equa MAT Legionella Policy. At All Cannings Primary the Competent Person is Jackie Whittaker.

3. Design and use of hot & cold water systems

3.1 Conditions that promote the growth of legionella bacteria

Legionella bacteria may contaminate water systems where the temperature is between 20 and 45°C. It is uncommon to find any significant growth below 20°C, the bacteria does not survive for any lengthy period above 60°C. The optimum temperature growth is 37°C

The presence of sediment, sludge, scale and organic material can act as a source of nutrients for Legionella bacteria. Commonly encountered organisms in water systems such as algae, amoebae and other bacteria may serve as a nutrient source for Legionella. The formation of a biofilm (slime) within a water system will also play an important role in harbouring and providing favourable conditions in which Legionella can proliferate.

The presence of water stagnation can also play a significant part in legionella growth. An example of this would be a building that has little to no use of its water systems within a school holiday or disused pipework that is still live.

If the conditions mentioned above are eliminated or controlled, the likelihood of legionella growth will be significantly reduced.

3.2 Design and installation of new or refurbished building services

All domestic water systems new or refurbished installations shall comply with current water regulations and ACOP L8 / HSG 274 guidance. It is important to ensure that potential hazards are designed out where possible before installation.

3.3 Cold Water Systems & Storage Tanks

Ideally, cold water should not be stored or distributed above 20°C. However, the water supply regulations allow the water companies to supply cold water at up to 25°C so maintaining a water temperature of below 20°C may not be possible. Where water is supplied at temperatures of above 25°C, the cold water in storage and at outlets should not be more than 2°C above the supply water temperature. Cold-water temperatures of above 20°C must be brought to the attention of the responsible person. Where possible the layout of cold services and tanks should ensure that water in the system does not gain heat. Tanks and pipe work should not be positioned close to heat sources, or where they could be affected by solar gain, unless they are effectively insulated.

There is no cold water storage tank on site.

3.4 Domestic Hot Water Services

Calorifiers' stored water should be maintained at 60°C with secondary return loops (where fitted) at no less than 50°C and should be suitably accessible for cleaning. It should be possible to isolate them, and they should incorporate drain connections at the lowest points which are large enough to permit the removal of sludge and quick drainage of the vessel. Hot water should reach at least 50°C at all outlets within one minute of running.

Pipe work should be as short and direct as possible especially where it serves intermittently used taps and appliances. On new systems, spurs from circulation loops shall not exceed 5 metres in length.

Where people at risk of scalding are served by the hot water system, "fail-safe" thermostatically controlled mixing valves shall be used to reduce the hot water temperature at the outlet to 43°C. These are valves that are unaffected by changes in water pressure and automatically close the hot water supply if the cold water fails. They will be positioned as close as possible to the hot water outlets. Those people at risk of scalding include young children, the very old, and those with sensory loss.

Mixed water pipework from the thermostatically controlled mixing valve should be kept as short as possible.

3.5 Cooling Towers

There are no wet cooling towers on site.

3.6 Ornamental water features

The School currently does not have any type of ornamental water feature installed.

The School will not install or operate any type of indoor ornamental water feature. If installation of an outdoor type ornamental water feature is under consideration then a risk assessment will be carried out at the pre-construction stage and then reviewed at post construction before commissioning is to commence

3.7 Operation of grounds sprinkler water systems

The School does not currently operate ground sprinkler systems. In any future installations, a risk assessment will be carried out and the written scheme revised to take this into consideration

3.8 Handling and exposure to compost

Legionella is often found in compost and legionnaires disease has resulted in a small number of cases from inhalation of dust or moisture droplets.

All staff who come into physical contact with compost must ensure the following:

- Staff must ensure that themselves and any children wash their hands as soon as is possible after contact
- Compost bags should not be stored in direct sunlight
- Compost bags should be opened carefully as not to disturb contents
- Compost bags ideally should not be opened in enclosed spaces such as sheds or green houses

3.9 Use of Water trays (children's play)

When water is allowed to stagnate, bacterial growth can occur which can be harmful to persons who interact with it.

Water trays must be:

- Emptied after each use
- Must be covered or left in an inverted position to prevent water build up
- Used with fresh water (mains water supply)

3.10 Use of rainwater supply (Water butts)

Water butts collect contain rainwater. Non-potable water may contain potentially harmful bacteria. The water is often stagnant and may warm up during the summer months leading to significant bacteria growth.

They may be used for gardening purposes such as watering of plants through a water can or similar. They must NOT be used in the following scenarios:

- Be used for children's play
- Be used in conjunction with a power washer

4. Operation and Maintenance of Building Services

4.1 Water temperatures at outlets

The flow temperature from hot water calorifiers should not be less than 60°C. The minimum temperature of the secondary recirculation pipework should not be less than 50°C.

Water temperatures (including Calorifier or combination water heater flow / return) at sentinel hot and cold outlets shall be measured and recorded monthly. Results should be recorded on a log sheet and filed in the legionella control log book.

Cold water outlet temperatures shall be measured after allowing the water to run at full flow for 2 minutes. The

temperature should be less than 20°C, or if above 20°C should be less than 2°C above the incoming supply from the water supply company.

Hot water outlet temperatures shall be measured after allowing the water to run at full flow for up to 1 minute. The temperature should be at least 50°C. However where mixing or blending devices are used which prevent the outlet reaching this temperature, the pipe surface immediately before the device should reach 50°C within 1 minute.

Representative outlets (outlets in between sentinels) should be measured on a rotational basis over a period of a year

4.2 Servicing of calorifiers/boilers

The school ensures the boilers are serviced annually. Every year hot water calorifiers shall have their drain valve (where fitted) water visually inspected for signs or sludge, rust or scale. If visual contamination is identified then cleaning should be carried out as necessary.

Before any hot water calorifier is returned to service following temporary disuse or servicing, the entire contents is to be brought up to and held at a temperature of at least 60°C for at least 1 hour. After this time, all associated outlets should be flushed to achieve and maintain a temperature of 50°C for 5 minutes

4.3 Disinfection of Domestic Water Storage Tanks

There is no water storage tank on site.

4.4 Little used outlets and showers

The need for intermittently or infrequently used taps and appliances shall be reviewed from time to time, by the Responsible Person. If such taps and appliances are not necessary the supplies shall be cut off close to the in-use supply pipe to ensure that no dead leg is formed. If it is not reasonably practicable to remove these outlets then a weekly flushing regime should be implemented.

During periods of little use of the water systems such as school holidays, both hot & cold outlets should be flushed weekly for a determined period.

5. Record Keeping

The following records shall be kept on file for a period of 5 years in a log book held within the school premises. Additionally, electronic records can also be kept.

Test Records (with dates) or work carried out to prevent or control legionellosis. Completed report sheets for:

- Weekly flushing of infrequently used outlets
- Monthly hot & cold water temperature checks including flow and return temperature

6. Action in the event of an incident

In the event of a single case of legionellosis, possibly acquired within the School then an emergency meeting shall be set up of a group comprising of:

- Competent Person
- Governing Body
- Head Teacher/ Responsible Person

The group should meet daily as necessary, with others as appropriate, to co-ordinate investigation of the problem, and progress any necessary action. Minutes are to be kept and a log of actions taken, and results of tests and inspections are to be recorded by the Competent Person.

Immediate action may include:

- Stopping admissions to affected site /area
- Sampling water from taps and showers prior to any disinfection or pasteurisation.
- Sampling of water from calorifiers serving the affected site prior to any disinfection or pasteurisation
- Increasing hot water temperatures at outlets to a minimum of 60°C

- Inspection of maintenance records for legionellosis preventative work
- Disinfection of water services in accordance with BS EN 806

Legionnaire's disease is not a notifiable disease in England and Wales but if staff acquire the disease, cases may be notifiable under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

The Health & Safety Executive may be involved in the investigation of outbreaks under the Health & Safety at Work Act 1974.

7. Microbial Monitoring for Legionella

Legionella water samples shall be taken annually, or under the following circumstances:

- Where control levels of the treatment regime (temperature control) are not being consistently achieved
- When an outbreak or incident is suspected or has been identified:

Samples will be taken in accordance with BS EN 7592 by suitably trained persons.

Analysis of water samples for legionella will be carried out by a UKAS accredited laboratory.

If disinfection of the water systems is necessary then this work will be carried out by trained persons who have been deemed competent to carry out this task. Sections 2.5 and 4.3 should be observed.

8. Procedures for Legionella Control Measures

The following table shows the control measures scheduled as planned preventative maintenance:

Frequency	Action	Responsibility
Weekly	Flushing of Infrequently used outlets (i.e. outside tap/ Calorifier Make up Unit in Mobile Classroom/ water fountain/ toilets)	Competent Person
Monthly	Monitoring temperatures at sentinel points and representative outlets	Competent Person
Weekly	Descaling taps on a rotational basis	Cleaning Manager
Annual	Sending a water sample to be tested at the lab	Competent Person
Annual	Carry out an internal Legionella Risk Assessment	Competent Person
Annual	Servicing of Thermostatic Mixer Valves	Legionella Control Contractor
Three Yearly	Carry out external Legionella Risk Assessment	Legionella Control Contractor

8.1 Flushing of little used water outlets Procedure (Weekly)

- Identify little used outlet(s)
- Open outlet whilst minimising the release of water aerosol (reduce spray)
- Flush the outlet until the temperature at the outlet stabilises and is comparable with the supply water e.g. until cold water is cold or hot water is hot
- Keep written records of action and report any defects to site manager.

Things to consider:

- Toilets should also be flushed by flushing through one cycle
- Drinking water fountains and outside taps should also be included

8.2 Monthly water temperature checks at outlets

Outlets without TMV's

- Identify outlet to be checked by following customised temperature form for the correct month
- Run hot tap on full flow for 1 minute and cold tap for 2 minutes
- Place temperature probe under outlet and record reading

Outlets with TMV's fitted

- Place surface probe attachment against hot inlet pipe to TMV ensuring a good contact and record reading. Due to heat loss through pipework material, add 2 degrees to final temperature reading.

8.3 Monthly temperature checks of Calorifiers

Ensure that you are confident in identifying the secondary hot water flow and return (where fitted) pipework and that it is safely accessible

- Place surface probe attachment against flow pipe ensuring a good contact and record reading. Due to heat loss through pipework material, add 2 degrees to final reading
- If secondary return loop is fitted, follow step 1
- Record results

8.4 Sending a water sample for lab testing

- Obtain a water sample kit from Smartwatertesting.co.uk. Follow the instructions and obtain a water sample from several outlets. Send for testing. Keep a record of the certificate received.