

# PERRYFIELDS PRIMARY PRU



## LEGIONELLA HEALTH AND SAFETY POLICY

<b>Review Date</b>	<b>Developed and Reviewed Date</b>	<b>Reviewer (Who?)</b>	<b>Approved By Name and Date</b>
<b>September 2021</b>	<b>June 2021</b>	<b>Resources and Pay Committee</b>	<b>Management Committee 06.07.2021</b>
<b>September 2023</b>	<b>July 2023</b>	<b>SLT Chair of Management Committee Safeguarding Governor</b>	<b>Management Committee 17.10.2023</b>
<b>June 2025</b>			<b>Management Committee</b>

<b>Minutes Reference</b>	
<b>Signature of Chair</b>	

## **Statement of intent**

Perryfields Primary PRU understands its responsibility to assess, prevent and control any risks from harmful bacteria, like legionella, and to implement suitable precautions to ensure the health and safety of our staff, pupils and school community. To meet this duty, we have developed this policy, which outlines how the school will keep the entire school community safe from legionella.

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 temperatures of 20°C and 45°C; however, it can be killed by elevated temperatures or chemical treatment methods. This policy outlines how we aim to mitigate any risks involving legionella bacteria.

## Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Control of Substances Hazardous to Health Regulations 2002
- Safety Representatives and Safety Committees Regulations 1977
- Health and Safety (Consultation with Employees) Regulations 1996
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Notification of Cooling Towers and Evaporative Condensers Regulations 1992

This policy has due regard to the following good practice guidance:

- HSE (2013) 'Legionnaires' disease'
- HSE (2014) 'Sensible health and safety management in schools'
- DfE (2018) 'Health and safety: responsibilities and duties for schools'

This policy operates in conjunction with the following school policies:

- Health and Safety Policy
- Control of Substances Hazardous to Health Regulations (COSHH) Risk Assessment
- Data Protection Policy

## 1. Roles and responsibilities

The Management Committee, as the employer, is responsible for:

- Ensuring that the overall health and safety provision in the school is effective and sufficient.
- Identifying and assessing sources of risks relating to legionella, e.g. checking the water systems.
- Managing risks relating to legionella.
- Preventing and controlling any risks that arise following a legionella risk assessment.
- Keeping and maintaining up-to-date records of any legionella risks and the control measures implemented.
- Carrying out any other duties as required by health and safety legislation.

The Headteacher is responsible for:

- The day-to-day development and implementation of safe working practices and conditions for all staff, pupils and visitors.

- Introducing management systems and practices that ensure risks are dealt with sensibly, responsibly and proportionately.
- Reviewing this policy and its effectiveness bi-annually, in liaison with the competent person.

Designating a competent person who is to be responsible for ensuring the school meets its health and safety duties, including in relation to legionella – the competent person will be the Operations Manager.

The competent person is responsible for:

- Assisting with the creation and implementation of this policy.
- Investigating accidents and incidents, understanding the causes and amending risk assessments as required.
- Being the designated contact with the LA and the HSE where necessary.
- Supporting staff with any queries or concerns regarding health and safety.
- Identifying hazards by conducting risk assessments.
- Implementing the specific measures needed to comply with the law, as outlined in the section 1 of this policy.
- Liaising with competent help when applying the provisions of health and safety law, e.g. external health and safety organisations.
- Reporting cases of legionnaires' disease to HSE, if necessary.
- Consulting with trade union representatives, other employee representatives, or employees where there are no representatives, regarding health and safety matters.
- Checking water temperatures during climatic changes.
- Monitoring the general bacterial numbers within water systems to ensure safe levels.
- Arranging expert microbiological sampling of water systems when elevated bacteria levels have been identified.
- Preparing a written scheme for preventing and controlling the risk of legionnaire's disease.
- Checking risks of contaminated water supplies.
- Checking systems for deposits of rust, sludge, scale or biofilms.

All staff are responsible for:

- Acting in accordance with this policy at all times.
- Reporting any concerns regarding legionella to the Operations Manager as soon as possible.
- Cooperating with their employers on health and safety matters.
- Carrying out their work in accordance with training and instructions.
- Familiarising themselves with the Health and Safety Policy and aspects of their work related to health and safety.
- Following the instructions of the Operations Manager.
- Ensuring the health and safety of pupils.

## 2. Identifying and assessing risks

The Operations Manager will conduct a risk assessment to identify and assess any risks regarding legionella.

Where required, the Operations Manager will seek advice when conducting the risk assessment, e.g. from external consultancies.

The Operations Manager and site staff will understand, and ensure any other relevant staff understand, how to use the water systems, equipment associated with the systems (e.g. pumps), heat exchangers, showers, etc.

By understanding the systems and equipment outlined above, the Operations Manager and site staff will ensure that any associated risks from exposure to legionella are identified. The school will establish whether:

- The water temperature in all or some parts of the system are between 20°C and 45°C.
- Water is stored or re-circulated as part of the system.
- There are sources of rust, sludge, scale, organic matter and biofilms.
- The conditions are likely to encourage bacteria to multiply.
- It is possible for water droplets to be produced and, if so, whether they can be dispersed over a wide area, e.g. showers and aerosols from cooling towers.
- It is likely that any of the school's community are more susceptible to infection due to age, illness or a weakened immune system, and whether they could be exposed to any contaminated water droplets.

The risk assessment/Legionella Control Scheme will include the following:

- Management responsibilities, including the name of the competent person and a description of the water system installed
- Details of the competence and training of all key personnel
- Any identified potential risk sources
- Any controls in place to mitigate these risks
- Monitoring inspections and maintenance procedures
- Records of the monitoring results and inspections and checks carried out
- Arrangements to review the risk assessment annually, particularly when there is reason to suspect it is no longer valid

When undertaking the risk assessment, if the Operations Manager deems that the risks are low and are being properly managed in accordance with the law, the assessment will be considered complete.

Where the assessment is considered complete, the Operations Manager may deem that no further action is required; however, any existing control will be maintained and the assessment will be regularly reviewed, in case anything in the system changes.

The risk assessment will be reviewed annually, following any known changes to the system or when a concern over the system has been raised.

If the risk assessment raises any concerns, the Operations Manager will inform the appropriate members of staff, e.g. the Headteacher, and control measures will be implemented.

The risk assessment will identify and evaluate potential sources of risk and:

- How the risks of exposure to legionella will be prevented.
- If prevention is not reasonably practicable, how the risk of exposure will be controlled.

### **3. Managing risks**

The Operations Manager has the authority, competence, understanding and skills to fulfil this role.

If several people are responsible for managing risks, the school will ensure that all competent persons understand their role in the management of the system.

Where contractors are used to undertake water treatments, the competent person will ensure that the treatment meets all legal obligations.

### **4. Preventing risks**

Following a risk assessment, the Operations Manager will consider whether the risk of legionella can be prevented by reviewing the type of water system that is installed and assess whether it is fit for purpose.

The school will ensure that the design, maintenance and operation of water services are in a condition that prevents or controls the growth and multiplication of legionella.

If risks that cannot be prevented are identified, the Operations Manager will develop a written control scheme, which will help the school to manage the risk of legionella.

The control scheme will implement effective control measures by outlining the following:

- The water system, e.g. develop a schematic diagram
- Who is responsible for carrying out the assessment and managing its implementation
- The safe and correct operation of the system
- What control methods and other precautions will be used What checks will be carried out, and how often will they be carried out, to ensure the controls remain effective

To ensure the health and safety of the school community regarding preventing legionella, the school will:

- Ensure that the release of water spray is sufficiently controlled

- Avoid water temperatures and conditions that favour the growth of legionella and other microorganisms
- Ensure water cannot stagnate anywhere in the system by keeping pipe lengths as short as possible or removing redundant pipework
- Avoid materials that encourage the growth of legionella
- Keep the system and the water in it clean
- Treat water to either control the growth of legionella (and other microorganisms) or limit their ability to grow
- Monitor any control measures applied
- Keep records of control measures and other actions taken, such as maintenance or repair work

The school will consult with employees or their representatives on the identified risks and the measures and actions that will be taken to prevent and control the risks.

## **Record keeping**

The Operations Manager and Administrative Assistant will maintain an up-to-date record of any significant legionella findings, including any individuals who are identified as being particularly at risk and the steps taken to prevent or control risks.

The school is required to keep records of the following:

- The person(s) responsible for conducting the risk assessment
- Any significant findings that were identified from the risk assessment
- Any written control scheme and details of its implementation
- Details of the state of operation of the system, i.e. in use or not
- Any results following monitoring inspections, including the dates of these

Records will be retained while they are in date, and for at least two years afterwards. Additionally, any records of monitoring inspections will be kept for at least five years.

In addition to 6.2, the school keeps records of the following items:

- Names and positions of people, and their deputies, responsible for carrying out the various tasks under the written control scheme
- A risk assessment and a written scheme of actions and control measures
- Schematic diagrams of the water systems
- Details of precautionary measures that have been implemented including enough detail to show that they were implemented correctly, and the dates on which they were carried out
- Remedial work required and carried out, and the date of completion
- A log detailing visits by contractors, consultants and other personnel
- Cleaning and disinfecting procedures and associated reports and certificates

Records will be retained in line with the school's Data Protection Policy.

## **Incident reporting**

All incidents of legionella will be reported as soon as possible to the Operations Manager.

The Operations Manager will be responsible for informing the Headteacher – 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 the Management Committee will be notified immediately.

## **Reporting procedure**

Should an incident require reporting, the Operations Manager, or a person appointed on their behalf, will file a report as soon as is reasonably possible.

The designated person will complete the relevant online form.

Alternatively, the designated person can report fatal, specified and major incidents via telephone on 0345 300 9923 (Monday to Friday 8.30am to 5pm).

The school will notify the LA, in writing, if we have a cooling tower or evaporative condenser on site, and include details about where it is located. We will also inform the LA if/when such devices are no longer in use.

## **Accident 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 risk assessment will be amended, to avoid reoccurrence.

Where appropriate, the Operations Manager will complete the relevant form as outlined in 8.2.

## **Implementing a control scheme**

- The Operations Manager will establish a written control scheme, where necessary.



- The implementation of any written control scheme will be monitored by the Operations Manager.
- The Operations Manager will supervise anyone involved in any related procedure of the written control scheme.
- The Operations Manager will ensure all responsibilities are defined in the written control scheme and all staff understand these responsibilities.
- Staff with any responsibilities within the written control scheme will have the necessary skills and experience needed to carry out their roles.
- The Operations Manager will ensure that there is an appropriate number of staff available during all hours that the water system is operating – this will be established depending on the risks the water system poses.
- The Operations Manager, or their deputies, will be contactable during all hours that the water system is in operation.
- There will be established methods for communication and management when there are several people who are responsible for the control scheme.

The school will be responsible for the health and safety of the school's community, regardless of if contractors are employed for any reason.

The school will not use water systems, parts of water systems or systems of work that lead to exposure of legionella.

The written control scheme will include details of the following:

- An up-to-date plan showing the layout of the plant or water system, including parts temporarily out of use (a schematic diagram is sufficient)
- A description of the correct and safe operation of the system
- The precautions that have been implemented
- Checks to carry out to ensure the written control scheme is effective and the frequency of such checks
- The remedial action to take if the written scheme is shown to be not effective

The written control scheme will give details on how to use and carry out the various control measures and water treatment regimes, e.g. health and safety information regarding storage.

The written control scheme will also provide details on the correct operation of the water system, including:

- Commissioning and recommissioning procedures.
- Shutdown procedures.
- Checks of warning systems and diagnostic systems in case of system malfunctions.
- Maintenance requirements and frequencies.
- Operating cycles – including when the system plant is in use and not.