



**Sussex Road CP School**  
**Legionella Risk Management Policy and Procedure**

**Context**

Legionella is a generic term for a type of bacteria which is common in natural and artificial water systems. Legionellosis is the name given to a group of pneumonia-like illnesses caused by Legionella. The School recognises the potential risks of Legionella and undertakes to ensure compliance with the relevant legislation with regard to the Control of Legionella in hot and cold water systems for all pupils and employees and to ensure best practice by extending the arrangements as far as is reasonably practicable to others who may also be affected by our activities.

As legislation is often amended and Regulations introduced, the references made in this Policy may be to legislation that has been superseded. For an up to date list of legislation applying to schools, please refer to the Department for Education website at [www.education.gov.uk/schools](http://www.education.gov.uk/schools) and the Health and Safety Executive website [www.hse.gov.uk](http://www.hse.gov.uk)

- Health and Safety at Work Act 1974
- Management of Health and Safety at Work Regulations 1999
- Care Standards Act 2000

**General**

- Legionella is a generic term for a type of bacteria (legionellae) which is common in natural and artificial water supplies. The bacteria thrive at temperatures between 20°C and 45°C but can be killed by elevated temperatures or chemical treatment.
- The School stores and distributes hot water above 50°C. Users are protected from scalding by controlling the delivery temperature of hot water from a tap to 43°C by the use of thermostatic mixing valves. Checks are required to ensure that the valves are working correctly.
- All illnesses due to the legionella species are known collectively as “Legionellosis” but the most well-known is “Legionnaires’ disease” which can be serious for elderly people and others with respiratory problems or immune deficiency.
- Infection is only a risk when there is inhalation of very fine water droplets that are contaminated with high concentrations of legionella bacteria. Healthy people are unlikely to contract an infection and outbreaks are rare though well publicised.
- Control is normally achieved by suitable design and maintenance of the water system and its associated plant. Additional control is achieved by appropriate storage of water and delivery of water at temperatures which do not allow the bacteria to proliferate.

**Purpose**

The purpose of this policy is to ensure that as far as possible all users of Sussex Road School are protected from the incidence of Legionnaire’s disease. This policy applies to all areas of the school’s site and covers both the hot and cold water supply systems. The school no longer has cold water loft storage tanks, or showers. All unused pipework legs have been removed in accordance with assessor instructions. Based in the KCC document ‘Reducing the risk of legionellae in hot and cold water system within buildings’ Sussex Road School is deemed a category III low risk premises. This policy should be read in conjunction with the School’s Health and Safety Policy

**Responsibilities**

The Local Authority

It is the policy of KCC to ensure that appropriate precautions for the control of Legionella bacteria are identified through a ‘Legionella’ risk assessment process, and appropriate control measures implemented to ensure, so far as is reasonably practicable, the health, safety and welfare of employees and others. The Health and Safety Executive promotes sensible risk management, and states that this is not about:

- creating a totally risk free society
- generating useless health and safety paperwork
- exaggerating or publicising trivial risks

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- stopping recreational activities where the risk are managed

A Landlord KCC's Health and Safety Department are responsible for arranging for a competent contractor to carry out a 'Suitable and Sufficient Legionella Risk Assessment' to be carried out on the school premises every 2 years.

Assessment of risk will include

- Monitoring whether control measures are being instigated fully.
- Correct water temperatures are being maintained.
- Engineering measures, such as temperature control values, are working properly
- An Action Plan or written scheme for preventing or controlling the risk, where appropriate.
- Monitoring and recording of precautions to include regular inspection and microbiological monitoring.

Any failures must be reported immediately to the Headteacher who will inform Kent County Council.

At the time of writing this policy the Local Authority preferred provider is HBE Ltd

Items checked by the company are currently highlighted by sticker in accordance with the company's normal practice. The full inspection report and Action Plan are held in a file in the School Office.

#### The Board of Governors

The named Health and Safety governor will, on behalf of the Governing Board ensure that the relevant testing is completed and that an up to date risk assessment is carried out by a professional company.

#### The Headteacher

The Headteacher has overall responsibility for all Health and Safety including water hygiene at Sussex Road School. The Headteacher hold an up to date Compliance Training Certificate provided by KCC. In the Headteacher's absence the Deputy Headteacher deputises in the role.

- Relevant risk assessments are carried out and that control measures are implemented.
- Appropriate training is provided.
- Ensure that flushing and testing of water outlets is carried out
- Any problems with water or the water system are reported to Kent County Council
- Monitor disinfection procedures where necessary
- Records are kept for each water outlet of flushing and testing and disinfection procedures.

Whilst having an oversight these responsibilities are delegated as follows:-

#### The Senior Leadership Team (SLT)

The School Business Manager will ensure the company completing the KCC Risk Assessment is accommodated in a timely fashion and the completed report shared with the Headteacher and Health and Safety Monitoring pair once it is received in School. Any items for concern will be report back to the Local Authority for action where the work to be undertaken falls under Landlord responsibility. The School will appoint a local company to undertake or contract out all remedial works required in order to comply with its obligations noted within the report. The school will where appropriate arrange a regular testing and maintenance programme to ensure that the water system remains compliant.

The School Business Manager will report where issues are raised as a concern at the regular checks completed by the KCC provider or the Caretakers monthly checks for remediation as soon as possible.

#### The Caretaker

The Caretaker has undertaken Legionella and legionnaire's disease awareness training, renewable every 2 years. Following formal training the caretaker has taken responsibility for carrying out and recording monthly tests on water system on the school's site, in accordance with the requirements of the HSE Approved Code of Practice, 'Legionnaire's disease: The Control of Legionella bacteria in water Systems. 2000 (L8)'. Test sites will remain consistent and sentinel taps will be chosen under the guidance of the Company completing the KCC Risk assessment. Results are recorded on standardised sheets and held electronically in the School Site area of Office 365. All results are then checked by the School Business Manager and are available at all times for monitoring by the Headteacher and the school's H & S Governor

The caretaker continues to work alongside compliance contractors to ensure in house monitoring is based on the most appropriate sentinel points and is correctly recorded. The caretaker will carry out monthly testing in accordance with the KCC document 'Reducing the risk of legionellae in hot and cold water system within buildings' (Kelsi) and will seek

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suitable advice and assistance from competent persons, Corporate Health and Safety Team, or Specialist Consultant where results are of concern falling outside acceptable parameters.

Duty Holder	Miss Sarah Bowles	Headteacher
	01732 352367	Headteacher@sussex-road.kent.sch.uk
Responsible Person Site Contact	Mrs Alison D'Alton	Business Manager
	01732 352367	adalton@sussex-road.kent.sch.uk
Deputy Responsible Person Site Contact	Mr Paul Turner	Caretaker
	01732 352367	pturner@sussex-road.kent.sch.uk

## COSHH

Duties under the Health and Safety at Work etc. Act 1974 (HSWA) extend to risks from legionella bacteria, which may arise from work activities. The Management of Health and Safety at Work Regulations (MHSWR) provide a broad framework for controlling health and safety at work. More specifically, the Control of Substances Hazardous to Health Regulations 2002 (COSHH) provide a framework of actions designed to assess, prevent or control the risk from bacteria like Legionella and take suitable precautions. The Approved Code of Practice: [Legionnaires' disease: The control of Legionella bacteria in water systems \(L8\)](#) contains practical guidance on how to manage and control the risks in the School's system.

COSHH provides a framework of actions designed to control the risk from a range of hazardous substances, including biological agents. The essential elements of COSHH are:

- risk assessment
- where reasonably practicable, prevention of exposure or substitution with a less hazardous substance, or substitution of a process or method with a less hazardous one
- control of exposure, where prevention or substitution is not reasonably practicable
- maintenance, examination and testing of control measures
- provision of information, instruction and training for employees
- health surveillance of employees (where appropriate, and if there are valid techniques for detecting indications of disease) where exposure may result in an identifiable disease or adverse health effect.

## WRAS

The purpose of WRAS is to contribute to the protection of public health by preventing contamination of public water supplies and encouraging the efficient use of water by promoting and facilitating compliance with the Water Supply (Water Fittings) Regulations and Scottish Water Byelaws.

All water fittings and associated materials must by law conform to the Water Supply Regulations, although there is no legal requirement to obtain WRAS approval. When carrying out repairs and renewals the School, will use of quality products and materials, using WRAS approved items wherever reasonably possible.

According to the Water Supply Regulations, it is the responsibility of the installer to ensure that water fittings meet the criteria.

This policy will reviewed following receipt up to date guidance within the recommendations of the biannual KCC commissioned Legionella Risk Assessment and Survey.

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## FLUSHING AND TEMPERATURE TESTING PROCEDURES

### Completing and recording water temperatures

Water temperature record sheets need to be filled in and kept within the School Site Water file on Office 365. Outlets failing to meet the required temperature will trigger a warning in the spreadsheet and should be reported for suitable action and retested in subsequent months until satisfactory. Hot Water should be at least 50° C after 1 minute and cold water below 20° C after 2 minutes flow.

If these temperatures cannot be achieved then the Headteacher or School Business Manager is to be informed with a view to taking remedial action or informing KCC/Help desk.

Scientific tests may be required when there appears to be a problem with the water supply, e.g. discolouring, temperature problems, etc. These should be reported to the Headteacher with a view to informing Amey who will arrange appropriate testing where it is considered necessary.

#### Hot and Cold Water Temperature Monitoring

Sentinel cold and hot tap on the main hot and cold water systems, which are not connected via a thermostatic mixing valve, are to be run for one minute (in the case of a hot tap) and two minutes (in the case of a cold tap) every month so that a temperature can be taken using a thermometer and recorded on the Water Temperature check sheet

A schedule for precautionary checks on hot and cold water taps (where there is water storage), the responsible person should organise checks to be carried out at the frequencies indicated below. Where the temperatures fall outside the standards actions should be taken to resolve the problem.

#### Weekly

Hot or warm water left in pipes for long periods can allow Legionella bacteria to multiply presenting a risk when finally discharged e.g. taps after the summer holidays.

All outlets including known infrequently used ones are to be flushed for several minutes to ensure any stagnant water is fully discharged. This will be carried out weekly by the caretaker during term times and prior to the return of site use at the end of any school breaks. The date of flushing at the end of each holiday is to be recorded on Office 365.

Infrequently used outlets will be reported to the School Business Manager to arrange for their removal.

#### Monthly Checks

Taps: Temperature of cold water sentinel taps, to check that water is below 20°C. Sentinel taps are the first and last taps on a water distribution system – see schematic drawing.

Run cold tap for 2 minutes then measure temperature by inserting calibrated digital thermometer in the water flow and record reading.

Temperature of hot water sentinel taps (nearest and furthest to the calorifier/water heater), to check that water is above 50°C. Run hot tap for 1 minute then measure temperature by inserting calibrated digital thermometer in hot water flow and record reading.

#### Annual checks:

The cold water tanks must be inspected (findings recorded) annually to ensure that there is not a build-up of any foreign bodies. Flushing / cleaning should take place if necessary. Flow rates should be checked. Cold water tank temperatures should be recorded annually, in the Summer.

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## **Actions in the event of negative temperature monitoring checks**

In the event of a negative temperature test result being noted, (i.e. either Hot water below 50°C or cold above 20°C) by the Responsible Person the following actions should be carried out.

### If hot water:-

- the boiler settings need to be reviewed to ensure that the temperature can be raised.
- further additional temperature checks should be made after 48 hours to ensure that the problem does not persist.
- if the temperature cannot be raised to the required level then further action needs to be taken to ensure the boiler is serviced/checked

### If cold water:-

- the situation should be monitored more closely for a period.
- in the event that the temperature remains above the required 20°C then further advice needs to be sought from Property Services.

In either case if monitoring indicates an ongoing issue then the water supply must be examined/tested by a suitably qualified contractor to ensure that the Legionella risk is managed. In the event that a test of the water supply indicates that Legionella is present in high concentrations then the following actions need to be carried out:

- Inform Amey/Property Services and contact Area Education Officer, who will take relevant steps to ensure that the issue can be monitored.
- To shut down any processes which are capable of generating and disseminating airborne water droplets and keep them shut down until remedial cleaning or other work is complete.
- To immediately arrange emergency disinfection to be undertaken if required.
- Depending on the client group or staff group that may have been exposed – monitor client/staff health to discern whether there are any undiagnosed cases of illness.

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### PROCEDURE FOR DISINFECTION

If the school produces a sufficiently high result after testing, and/or a risk assessment recommends action, it will be disinfected by an approved contractor. The Headteacher or an elected representative will arrange the time and date of disinfection with the selected contractor.

Affected areas will be withdrawn from use until disinfection has been completed. Flushing of outlets in these areas will cease until disinfection has been completed.

A supply of clean water for the kitchen area will be drawn off from an uncontaminated source and stored in containers on the morning of a disinfection visit. Once disinfection commences, the water system will not be usable (except in WC's) until the contractors declare it safe. (Note: Drinking water must only be drawn from the bottled supply).

Alternative hand cleaning methods will be instigated to supplement the wearing of protective gloves for personal care. (e.g. Hibiscrub & antiseptic wipes).

Staff and pupils will be protected from accidental use or drinking of disinfected water by securing the outlets or denying them access.

Disinfected areas will be re-instated immediately after completion of the disinfection process and the flushing regime will recommence.

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