



Legionella Corporate Policy

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Document summary

The risk of contracting Legionellosis from East Sussex County Council premises is generally low, but a managed approach to the condition and use of water systems is vital to manage risk, raise awareness of standards and ensure compliance with specific statutory requirements.

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Legionella Corporate Policy

Key Points:

- This Policy outlines the requirements for managing legionella in County Council occupied premises
- The specific role of Business Services Department (BSD) Property in commissioning and managing Legionella Risk Assessments of water systems is described
- Responsibilities in relation to this Policy fall on BSD (Property Division), Chief Officers, Managers, PAT Health and Safety Advisers and employees
- Copies of all Health & Safety policies can be found on the intranet and Webshop.

1. Introduction

- 1.1 This Policy helps ensure the County Council complies with the requirements detailed in the HSE Approved Code of Practice and Guidance (L8), "Legionnaires' disease: The control of legionella bacteria in water systems".
- 1.2 Compliance with this document should then ensure compliance with the legislative requirements of the Control of Substances Hazardous to Health Regulations 2002.
- 1.3 The Appendix to this policy gives background information on the control of legionella.

2 Responsibilities

2.1 Business Services Department (Property) to ensure that:

- 2.1.1 where the County Council is responsible for the maintenance of the buildings' water system, BSD Property will commission risk assessments of water systems in County Council buildings (excluding schools, for which separate arrangements apply) by way of a hazard assessment to determine the likelihood of colonisation by legionella in water services, the potential for the proliferation of legionella bacteria in aerosols and to establish a premises-specific asset register.
- 2.1.2 they advise schools of their delegated responsibilities for ensuring that this risk assessment is undertaken.
- 2.1.3 where the owner, landlord, sub-lessor or agent of any premises occupied by the County Council is in control of the maintenance and repair of the water system that they are made aware of their responsibilities in respect of the control of legionella bacteria and the requirement to meet the standards set out in this Policy.

- 2.1.4 review the design and construction of new and existing water systems, determine any necessary physical remedial action, e.g. removal of redundant plant, pipe-work, dead legs etc. and specify their safe operation and maintenance in accordance with L8.
- 2.1.5 determine from the risk assessment any necessary appropriate control methods for the treatment and monitoring of water systems (in accordance with the requirements of L8), including a written scheme to implement the necessary control measures.

2.2 Chief Officers must make arrangements within their departments to ensure that:

- 2.2.1 in respect of premises under their direct control (i.e. not Corporate Office Accommodation), a premises-specific assessment of the risk of contracting legionellosis is carried out, to consider if it is possible that water in a fine mist (aerosol) will be produced, e.g. through the use of showers, spray taps and hoses. This assessment must take into account the users of the premises i.e. are they in the susceptible groups such as older people, those with reduced immune systems, very young etc.

Note: It should be noted that provided appropriate water treatment regimes are place and there is no equipment which could give rise to the inhalation of water vapour droplets, the hazard is significantly reduced.

- 2.2.2 legionella risk assessments of the water systems in all premises for which they are responsible must be carried out by competent contractors to determine if conditions are present which will favour colonisation by legionella bacteria. Copies of these assessments are kept on the Corporate Property Information System and if any doubt exists as to whether a risk assessment has been carried out, contact the Help Desk (Schools – 01273 482000 or Non-Schools – 01273 482626).
- 2.2.3 in conjunction with BSD Property, ensure any requisite physical modifications to the water systems and/or where necessary any appropriate water treatment regimes are carried out.
- 2.2.4 the frequency of the review of the risk assessments is determined by the risk assessment itself and will therefore vary from property to property. The risk assessment must also be reviewed when there is reason to suspect it may no longer be valid, e.g.
- changes to the water system or its use
 - changes to the use of the building
 - availability of new information/statutory requirements
 - evidence that existing control measures are no longer effective
 - where the water system (or part of it) has been shut down for more than 2 months and then re-commissioned – see also the section on “stagnation” in Appendix 1
 - upon confirmation that the water system has been colonised by legionella bacteria at levels that require action (as set out in the ACOP)
 - upon any confirmed case of legionellosis (e.g. Legionnaires disease) which could possibly be related to the premises.

- 2.2.5 in the event of a confirmed case of legionellosis, in liaison with the PAT Health and Safety Team, a contingency plan is implemented which will include:
- the identification of people who may have been exposed
 - involvement of the public health authorities
 - dissemination of information to employees, their union representatives and other interested parties of the nature of the risks
 - measures to rectify the situation.
- 2.2.6 similar arrangements are agreed with the landlord and other employers/agencies involved where there is joint occupancy of premises.
- 2.2.7 arrangements are made for monitoring the implementation of this Policy in their departments to ensure that any risks are minimised or eliminated, resource allocation is considered and agreed and that water systems are appropriately managed.
- 2.2.8 records are retained for at least five years.

2.3 LMG and other Line Managers must ensure that:

- 2.3.1 water systems in any premises that they are responsible for are appropriately managed in accordance with the guidance given in Appendix 1.
- 2.3.2 the requirements specified in the responsibilities of Chief Officers (above) are put into place in respect of locations within their control, so as to eliminate or minimise the risks of contracting legionellosis.
- 2.3.3 where they delegate water system management roles in full or in part to Controllers of Premises or others e.g. Controller of Premises support function at any particular site, they must ensure the Controller or those delegated any duties has sufficient understanding and resources to be able to carry out this function effectively. A half day course is organised by the Corporate Training Team who can be contacted on 01323 747102.
- 2.3.4 they know the action to be taken if a suspected case of legionella is reported at their premises.

2.4 PAT Health and Safety Advisers:

- 2.4.1 provide guidance to managers about the risks from legionella.
- 2.4.2 commission training for managers and Controllers of Premises, on awareness of the risks associated with legionella and their responsibilities in ensuring adequate controls are in place is provided. See 2.3.3 above.

2.5 Controllers of Premises must ensure that:

- 2.5.1 a copy of the latest Legionella Risk Assessment is held on site. Please note that the risk assessments are available on the Corporate Property Information System.

- 2.5.2 they are aware of their expected duties in relation to legionella control systems by attending the relevant training course. See 2.3.3 above.
- 2.5.3 where a part of their role is delegated to others e.g. Controller of Premises support function, ensure through sites records that those checks by others are taking place.

2.6 **Employees must:**

- 2.6.1 adhere to advice given in relation to the control of legionella. Where they are concerned about the risk of an outbreak of legionellosis, they must report their concerns to either the Controller of Premises, the BSD Help Desk (Schools – 01273 482000 or Non-Schools – 01273 482626) or their PAT Health and Safety Adviser so that appropriate measures can be taken to identify and eliminate or reduce the risks.

Appendix 1: Guidance for the Control of Legionella

General

- Legionella bacteria are common in most natural water courses, such as rivers and ponds, and as such may contaminate and grow in other water systems, such as hot and cold water services. They survive low temperatures and thrive at temperatures between 20° C and 45°C.
- Legionella can cause a serious and potentially fatal pneumonia in susceptible persons known as Legionnaires' disease. It is the most well known and serious form of a group of diseases known as legionellosis. Other similar (but usually less serious) conditions include Pontiac fever and Lochgoilhead fever.
- Legionnaires' disease is normally contracted by breathing very fine droplets of water in aerosol form, which are contaminated by the bacteria deep into the lungs the risk increases with higher concentrations of the bacteria and the duration of the exposure. There is no evidence of person to person infection, and it cannot be contracted solely by drinking or washing in contaminated water.
- It should be appreciated therefore that the legionella bacteria is the potential hazard and any risk to health will be dependent on a susceptible person's exposure to the inhalation of contaminated water vapour/aerosol, (e.g. from showers or other sources of spray).
- In practice most outbreaks have been connected with contaminated evaporative condensers and cooling towers associated with air conditioning systems, where the water aerosols were dispersed over a wide area. The County Council currently has no such installations.

Avoidance of Conditions Favouring Growth of Organisms

- As far as practicable, water systems should be operated at temperatures that do not favour the growth of Legionella. 60°C is recommended for hot water storage and 50°C or more (hot) and 20°C or less (cold) for distribution. (It is crucial that any required increase in temperatures to control legionella bacteria must NOT transfer the hazard to the one of scalding. Appropriate (temperature) control measures, e.g. approved type thermostatic mixing valves and warning notices, must be implemented at hot water delivery points to prevent scalds or burns, particularly with vulnerable people in the County Council's care. Warning notices alone are not an adequate control measure, particularly where older, infirm or young persons use the facilities.
- Use of materials that may provide nutrients for microbial growth should be avoided. Corrosion, scale deposition and build up of biofilms and sediments should be controlled. Tanks should be effectively insulated and lidded.

Avoidance of Stagnation

- Dead legs, (i.e. water services leading from the main circulation water system to taps or appliances which are not used at all or are used infrequently), and any other parts of systems which may provide a stagnant reservoir for colonisation should be eliminated.

Minimisation of Water Sprays

- Dissemination of contaminated aerosols should be reduced by careful design of equipment, use of drift eliminators to stop excessive circulation of potentially contaminated air, enclosure, etc.

System Maintenance

- Where a survey identifies a system with the potential for the proliferation of legionella bacteria, in respirable water aerosols or mists, appropriate control and monitoring regimes must be put in place as soon as practicable.
- Guidance on these regimes is set out in L8, copies of which can be found on the HSE's website www.hse.gov.uk and compliance will require appropriate risk assessment, a written scheme including method statements, safe systems of working and appropriate levels of competence for those undertaking the work.
- Care must be taken to ensure that where water treatment is necessary, any chemicals are properly purged from the water systems before they are returned to normal use. Any biocides proposed to be used must be subject to an appropriate Control of Substances Hazardous to Health (COSHH) Assessment.
- Where raising water temperatures is used as a control method, excess temperatures must be controlled or reduced, before water systems are returned to normal use.
- Equipment that produces water droplets (aerosols) must be dismantled, de-scaled and disinfected every three months.
- Dead legs, including showers that are infrequently used, should be flushed through without creating spray aerosols at least once per week, and before use, for several minutes; or otherwise be decommissioned and removed.
- Where a water system has not been used for a period of three months or more, and it is intended to be brought back into use, sampling should be carried out to determine the most appropriate method of dealing with the presence of legionella bacteria.