

## Legionella Management (Pavilion) Policy

In recognition of its duty under the:

- Health and Safety at Work etc Act 1974 (HASWA)
- Management of Health and Safety at Work Regulations 1999 (MHSWR)
- Control of Substances Hazardous to Health Regulations 2002 (COSHH)

Cottenham Parish Council undertakes to:

- Identify and assess the risk of legionella infection to its employees, contractors and visitors arising from the manner in which the water systems over which the Council has control are operated, managed or designed
- At all times comply with the Health and Safety Executive's Approved Code of Practice and Guidance Document L8, Legionnaires disease: The Control of Legionella Bacteria in Water Systems (ACOP)

The responsibility for the implementation of this Policy are as follows:

The Parish Clerk will:

- Ensure that adequate resources are available for the formulation, monitoring and recording of appropriate procedures which comply with the ACOP
- Ensure that adequate resources are available to provide appropriate information, instruction, training and supervision to employees identified as having a role to undertake in the implementation of legionella management procedures
- Appoint a 'Responsible Person' to manage the necessary procedures for the prevention of Legionnaires' disease.

The Responsible Person will:

- Ensure suitable arrangements are in place to identify all water systems managed by the Council and assess them for the potential risk of legionella infection
- Establish suitable arrangements to manage identified risk areas including identification of management responsibilities, training and competence
- Ensure that adequate resources are available to address any needs identified in the risk assessments and that the risk assessments are acted upon
- Review the risk assessments and remedial measures implemented annually
- Ensure that the established procedures are brought to the attention all persons affected by them.

All employees shall in undertaking their activities comply with this Policy and perform their duties in accordance with any information, instruction and training received.

### Understanding Legionnaire's Disease

Legionellosis is the term used for infections caused by Legionella Pneumophila and other bacteria from the family Legionellaceae. Legionnaires' disease is a pneumonia that principally affects those who are susceptible due to age (over 50), illness, immunosuppression, smoking, lack of fitness etc and may be fatal. Legionellae can also cause less serious illnesses which can affect all people.

Infection is attributed to inhaling Legionella bacteria, in water droplets or aerosol which are small enough to penetrate deeply into the lung. Symptoms include muscle strain and headache followed by fever and chills. Infection with Legionella bacteria can be fatal in approximately 12% of Legionnaires' disease each year in the UK.

Legionella bacteria are widespread in natural sources of water. They may enter manmade systems where, under favourable conditions, they can multiply. Legionella bacteria can survive under a wide variety of environmental conditions and have been found in water at temperatures between 6oC and 60oC. Water temperatures in the range of 20oC to 45oC seem to favour growth. The organisms do not appear to multiply below 20oC and will not survive above 60oC. They can remain dormant in cool water and multiply only when water temperatures reach a suitable level.

Legionella bacteria also requires a supply of nutrients to multiply. The presence of sludge, scale, sediment, algae and biofilm play an important role in harbouring and providing favourable conditions in which the Legionella bacteria may grow.

If water droplets are created and dispersed into the atmosphere from systems containing Legionella bacteria, then people in the vicinity may be at risk. A number of factors are required to create a risk of Legionellosis:

- The presence of Legionella bacteria
- Conditions suitable for the proliferation of those bacteria
- A means of creating and disseminating an aerosol
- The presence of susceptible individuals

Conditions of favouring proliferation of Legionella re:

- Moisture
- Temperature between 20oC and 45oC
- Presence of nutrients and biofilm

The elimination of as many of these conditions as possible forms the basis for control of the risk. The prevention of risk requires elimination of the possibility of exposure to water spray.

### **Legislation and guidance**

In implementing this Policy Cottenham Parish Council will use as a general source of practical help the following listed documents:

- HSE Approved Code of Practice L8 (rev) : The Control of Legionella Bacteria in Water Systems (ACOP)
- BS 6700:1997 Specification for Design, Installation, Testing and Maintenance of Services supplying water for domestic use within buildings and their curtilages
- The Control of Substances Hazardous to Health Regulations 2002
- The Water Supply (Water Fittings) Regulations 1999, Statutory Instrument
- The Health and Safety at Work etc Act 1974
- The Workplace (Health, Safety and Welfare) Regulations 1992
- The Management of Health and Safety at Work Regulations 1999
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013

## **Managing the risk: responsibility structure**

The Parish Clerk shall:

- Ensure that adequate resources are available for the formulation, monitoring and recording of appropriate procedures which comply with the ACOP
- Ensure that adequate resources are available to provide appropriate information, instruction, training and supervision to employees identified as having a role to undertake in the implementation of Legionella Management Procedures
- Appoint a 'Responsible Person' to manage the necessary procedures for the prevention of Legionnaires' disease

The Responsible Person shall:

- Accept management responsibility for aspects of Legionella control
- Ensure suitable arrangements are in place to identify all water systems managed by the Council and assess them for potential risk legionella infection
- Establish suitable arrangements to manage identified risk areas, including identification of management responsibilities, training and competence
- Ensure that adequate resources are available to address any needs identified in the risk assessments and that the Risk Assessments are acted upon
- Review the Risk Assessments and remedial measures implemented annually
- Ensure that the established procedures are brought to the attention of all persons affected by them • Arrange for Risk Assessments to be carried out on water systems and plant for each property. The Risk Assessments shall be reviewed annually
- Arrange for remedial work to be carried out as highlighted by the Risk Assessment.
- Put in place water temperature monitoring, cleaning, disinfection, certification routines and non-conformance to be fully recorded
- Keep permanent records of all remedial work and Risk Assessments in the relevant property file. The records will be kept for 5 years and will be readily available for inspection.

All Cottenham Parish Council employees shall in undertaking their work activities comply with this Policy and perform their duties in accordance with any information, instruction and training received.

## **The Estate**

The Estate comprises all properties and buildings owned or occupied by Cottenham Parish Council for which it has responsibility for the planned maintenance of that equipment. Where Parish Council buildings are occupied by a tenant it shall be the tenants responsibility to assess the legionella prevention regime required.

## **Managing the risk: Control regime**

Cottenham Parish Council will where appropriate adopt the following control measures:

- Controlling the release of water spray
- A temperature regime where:
  - Hot water is stored at temperatures above 60oC and distributed above 50oC. Consideration shall be given to the installation of thermostatic mixing valves where occupants may be at risk from scalding
  - Cold Water is stored at temperatures below 20oC
- Avoidance of water stagnation by:

- Utilising mains pressure systems
- Utilising pumped secondary returns
- Utilising local small storage water heaters
- Utilising un-vented water heaters and calorifiers
- Minimising the volume of cold stored water to less than 24 hours water use
- Removal of dead ends
- Regular flushing of dead legs, low use outlets and low use showers
- Avoidance of the use of materials that harbour bacteria and other micro organisms
- Maintenance of the cleanliness of water systems and the water in it where necessary
- Cleaning and disinfection shall only be carried out by specialist contractors according to the recommendations of the system manufacturer or Part 2 of the ACOP as appropriate

Use of Type 1 biocide treatment techniques; the application of low concentrations of chlorine or chlorine dioxide to a level allowed by drinking water standards to not only kill off Legionella and other bacteria but also the biofilm

- Thermal disinfection following plant shutdowns and holiday periods of over one week's duration by raising the temperature of the distribution system to 60oC for more than one hour and running each outlet for five minutes working back from the most remote outlet to the calorifier. Cold outlets shall be run with the respective hot outlet
- Flushing of all WCs with lids closed following plant shutdowns and holiday periods of over one week's duration
- Routine sampling and microbiological monitoring of hot and cold water systems is not necessary since systems are supplied with potable water. However, microbiological investigation shall be carried out when taste or odour problem are reported and when an outbreak is suspected or has been identified

Analysis of water samples shall be undertaken by a laboratory accredited by the United Kingdom Accreditation Service (UKAS)

To ensure precautions remain effective the condition and performance of the water systems will be monitored as described in Section 8

### **Risk assessments**

The Responsible Person shall arrange for Risk Assessments to be carried out on water systems and plant for each property.

The Risk Assessments shall be reviewed annually.

The water services Risk Assessment will be carried out according to the provisions of the ACOP.

The water Risk Assessment shall identify all water related systems which could potentially create a risk to health.

### **Monitoring**

The Responsible Person shall put in place water temperature monitoring, cleaning, disinfection and certification routines on water systems and plant for each property.

In order to comply with the ACOP regular monitoring, recording and review shall take place.

### **Action in the event of an outbreak**

Legionnaires' disease is not notifiable under public health legislation in England Wales. An outbreak is defined as two or more confirmed cases of Legionellosis occurring in the same locality within a six month period. The Health and Safety Executive (HSE) or the Local Authority Environmental Health Officer (EHO) may be involved in the investigation of outbreaks their aim being to pursue compliance with health and safety legislation. The Local Authority or EHO may make a site visit in their search for the source of the outbreak. The Responsible person shall cooperate fully with the outbreak investigation team who may make the following requests:

- Shut down processes or plant capable of generating and disseminating airborne water droplets and keep them shut down until sampling and remedial cleaning is complete
- Provide water samples from processes or plant before emergency disinfection is undertaken. Where necessary, chemical and thermal disinfection shall be carried out in accordance with the ACOP
- Make operational records available for scrutiny

Final clearance from the outbreak investigation team may be required to restart the water system.

### **Periodic audit and review**

When the Legionella Control Regime is fully implemented, periodic audits shall be conducted to confirm that the objectives are being achieved and to review any change in the control regime or systems that need to be made.

The following team members shall meet at the stated frequencies:

Parish Clerk and Responsible person annually to consider:

- The efficiency of the Control Regime
- The adequacy of available resources
- The Risk Assessments
- The remedial actions
- The water temperature monitoring
- Training requirements
- New Legislation
- The preparation of the Risk Assessments, program, performance and competence
- The water temperature monitoring procedures, program, performance and competence
- The up-keep of the site logbooks
- The cleaning, disinfection and certification routines
- The completion of remedial works and remedial action sheets