



Shardlow Primary School

Aspire Achieve Thrive



Legionella Management Policy

Approved by:	Local Governing Body
Date:	24 Feb 2025
Minute no:	Out of Committee
Version:	1.3
Review cycle:	Every two years



Version Control

Version	Date	Author	Changes
V1.1	March 2019	K Magner	Edited record sheets in appendices Edited formatting
V1.2	June 2019	K Magner	Editing spelling, punctuation and grammatical errors following feedback from governors.
V1.2	June 2020	M Davies	No changes made
V1.2	June 2021	K Magner	No Changes made
V1.2	Jan 2023	K Magner	Formatting changes only
V1.3	Feb 2025	K Magner	Section 2- updated legislation Section 8- change to review and training Change to scheduling of tests – now annual from biennial

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1. Introduction

Legionella Pneumophila (legionella) and related bacteria are commonly found in low numbers naturally in environmental water sources such as rivers and reservoirs etc. The bacteria, given the right conditions, will colonise manufactured water systems and given the right conditions multiply to a level where the legionella bacteria presents a risk to health.

This document sets out Shardlow Primary School's procedures and strategy to minimise both the growth, and risk, from exposure to legionella and related bacteria of:-

- any persons using the school's buildings, and
- any persons exposed through the school's undertakings.

The document should be used in conjunction with any relevant legislation, Approved Codes of Practice, Health and Safety Executive (HSE) guidance and other specific procedures relating to the presence of legionella in premises.

2. The Law

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is often amended and Regulations introduced, the references made in this Policy may be to legislation that has been superseded.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 and the Health and Safety Executive website www.hse.gov.uk.

Relevant legislation and guidance includes:

- (i) Health and Safety at Work Act 1974
- (ii) Management of Health and Safety at Work Regulations 1999
- (iii) Care Standards Act 2000 (where applicable)
- (iv) Control of Substances Hazardous to Health (COSHH) Regulations 2002
- (v) HSE's L8 Legionnaires' disease: The control of Legionella bacteria in water systems

For detailed and up-to-date guidance on legionella management, refer to HSE's L8 guidelines.

3. General information

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 "legionellaoses" 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.

4. Minimizing Risk

The school recognises its responsibilities and will minimise the risk from exposure to legionella by:-

- Identifying and monitoring areas of the premises that may be affected by legionella.
- Establishing clear procedures for managing legionella risks. Developing and maintaining site specific risk assessments.
- Providing suitable information, instruction and training to employees and other persons relating to legionella.
- Monitoring, auditing and reviewing the policy and procedures as required.

5. Control Measures

To achieve ongoing control of legionella, thorough flushing of the water system is required alongside any engineering controls.

Effective control measures will require the school to:

- i. Monitor any water outlets that are not in regular use.
- ii. Record the flushing of all water outlets.
- iii. Record the temperature of hot and cold water outlets.
- iv. Ensuring risk assessments are up-to-date and reflect any changes in the system
- v. Ensuring ~~biennial~~ **annual** testing by a reputable contractor, accredited for legionella control and risk assessment

6. Roles & Responsibilities

Management of Health & Safety is the delegated responsibility of the Local Governing Body (LGB) from the Board of Trustees of ONE Academy Trust.

The Head teacher is responsible for ensuring the procedures agreed by the LGB with regard to the safe management of legionella risk are adhered to.

The LGB should ensure that:

- A Legionella Safety Management System is established and maintained.
- Implement management systems to ensure that operating procedures for the management of the risk from legionella is effective.

Headteacher responsibilities:-

- Management of the legionella policy and procedures.
- Implement a strategy for undertaking and monitoring the premises for legionella.
- Oversee remedial work that is identified as necessary from the premises legionella risk assessment and ensure that such measures are effective.
- Provide advice and guidance.
- Implementation of changes to the policy occurring as a result of a review.
- Manage the budget for the maintenance of legionella safety.
- Ensure that any training undertaken is suitable and appropriate.
- Implementation of legionella premises risk assessments.
- Disseminate policy and procedures to staff.
- Liaise with DCC Health & Safety in the event of a legionella outbreak.
- Manage the budget for the maintenance of legionella safety.

Caretaker responsibilities;**To conduct the following using the guidance in appendix 1 and 2**

- Maintain an effective record system using the documents in appendix 3, 4 and 5
- Undertaking and reviewing risk assessment.
- Oversee maintenance records.
- Ensuring that flushing and testing of water outlets is carried out and recorded.
- Reporting any problems with water or the water system
- Disinfection procedures where necessary.

Office administrator responsibilities;

- Implement an annual schedule for water testing and risk assessment updates by a reputable, accredited contractor.
- Oversee the work of the Caretaker responsibilities

7. Risk Management

The risk management procedure will reduce the possibility of creating conditions in which the risk from the exposure to legionella and related bacteria is increased.

The risk shall be controlled by:-

- 1) Not allowing the proliferation of the organisms in premises water systems.
- 2) Reducing so far as is reasonably practicable, the exposure of persons to water droplets and aerosols.

Legionella safety risk management shall address issues arising from:-

- Requirements of Regulations - the criteria for the identification of potential hazards and risks relating to the premises hot and cold water systems and where applicable any air conditioning units.
- Prioritisation of identified risks.
- Formal premises risk assessments.
- Monitoring the effectiveness of existing risk control methods.
- Auditing the management action/systems and the risk review process.

Premises Risk Rating Classification

At Shardlow Primary School:-

The main premises is considered Category 3 – Low Risk (e.g., premises such as primary schools with low hot water storage capacities, no access to aerosols under normal circumstances, and cold water supplied directly from mains).

Risk Assessment and Inspections

Annual legionella inspection, risk assessment review, system cleaning, chlorination and associated works will also be undertaken by a competent specialist contractor.

Suggested Annual Inspections

	Category 3 – Low Risk
Summer (Jun – Aug)	All Cold Water Storage Tanks (CWST)'s will be examined for condition, water quality and cleanliness (debris, silt etc). The temperatures of all stored water (Hot and Cold) will be taken and entered on to the review sheet, along with all sentinel outlet temperatures. Risk Assessment Review (Every two years)
Winter (Dec – Feb)	CWST's and pipe work will be checked for integrity and the temperatures from sentinel outlets are taken and recorded. A clean and chlorination of the hot and cold water system will not be carried out as routine but only if identified as necessary by the inspection.

8. Review and training

This policy will be reviewed every two years by the Headteacher and Local Governing Body to ensure continued compliance with UK regulations and best practices for legionella control.

Regular training will be provided for staff involved in legionella management, including updates on HSE guidelines and new best practices.

Appendix 1- Description of Caretaker Duties

FLUSHING AND TEMPERATURE TESTING PROCEDURES

1. FLUSHING

- a. All water outlets (hot & cold) will be flushed through weekly and a record will be kept in writing on the water outlet flushing checklist by the person carrying out the flushing.
- b. Flushing will last for at least two minutes at a reasonable flow rate.
- c. Where water outlets are routinely used, then this acts as the flushing routine and additional flushing is not required. However, flushing will always be required for all water outlets during periods of none use which exceed four days. Flushing is only required at the end of the period of non-use.

2. TEMPERATURE TESTING

- a. A single 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 List.
- b. The cold water outlet temperature should be below 20°C after two minutes running.
- c. The hot water outlet temperature should be above 50°C after one minute running,
- d. If these temperatures cannot be achieved then the Headteacher or School Business Manager is to be informed with a view to taking remedial action.
- e. 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 NPS who will arrange appropriate testing where it is considered necessary.
- f. If a positive Legionella test is reported there will be a re-test every 3 or 6 months, dependent upon the test results, until two consecutive clear readings are established.

3. PROCEDURE FOR DISINFECTION

- a. If the school produces a sufficiently high result after testing, and a risk assessment recommends action, it will be disinfected by an approved contractor.
- b. The School Business Manager will arrange the time and date of disinfection with the selected contractor.
- c. 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.
- d. 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.
- e. 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).
- f. Alternative hand cleaning methods will be instigated to supplement the wearing of protective gloves for personal care.).
- g. Staff and pupils will be protected from accidental use or drinking of disinfected water by securing the outlets or denying them access.
- h. Disinfected areas will be re-instated immediately after completion of the disinfection process and the flushing regime will recommence.

Appendix 2- Check List for Hot & Cold Water Systems

SERVICE	TASK	FREQUENCY
Hot Water Services	Arrange for sample to be taken from hot water calorifiers, in order to note condition of drain water	Annually
	Check temperatures in flow and return at calorifiers	Monthly
	Check water temperature up to one minute to see if it has reached 50°C in the sentinel taps.	Monthly
	Visual check on internal surfaces of calorifiers for scale and sludge, where practical. Check representative taps for temperature as above on a rotational basis.	Annually
Cold Water Services	Check tank water temperature remote from ball valve and mains temperature at ball. Note maximum temperatures recorded by fixed max/min thermometers where fitted.	Six Monthly
	Check that temperature is below 20°C after running the water for up to two minutes in the sentinel taps.	Monthly
	Visually inspect cold water storage tanks and carry out remedial work where necessary. Check representative taps for temperature as above on a rotational basis.	Annually
Little-used Outlets	Flush thoroughly and purge to drain, or purge to drain immediately before use, without release of aerosols.	Weekly

Appendix 3- Control of Legionella Record Sheet

WEEKLY: Record - Flushing of little used outlets

Flushing should last a minimum of 2 minutes.

[illegible]

Appendix 4- Post holiday period checks

Control of Legionella

Record – Returning to school following a holiday period

Where water outlets are routinely used, then this acts as the flushing routine and additional flushing is not required. However, flushing will always be required for all water outlets during periods of none use **which exceed 4 days**. Flushing is only required at the end of the period of non-use.

Flushing should last a minimum of 2 minutes.

	Aut 1	Aut 2	Spr 1	Spr 2	Sum 1	Sum 2
Location	Sign	Sign	Sign	Sign	Sign	Sign
Staffroom sink						
Disabled toilet						
Staff toilet						
Girls toilets						
Boys toilets						
Library sink						
KS2 Sinks						
Derwent Class - sinks						
Kitchen sinks						
Ockbrook Class - sinks						
Trent Class - sinks						
Trent toilets						
Outside Tap						

Appendix 5- Monthly Temperature Checks

Control of Legionella

Monthly: Record of temperature checks at the sentinel hot and cold water outlets

Date	Temperatures at hot water sentinel outlets for each hot water cylinder (refer to schematic)								Comments
	(should reach at least 50 °C within a minute of running the outlet)								
	Tank 1		Tank 2		Tank 3		Tank 4		
	nearest	furthest	nearest	furthest	nearest	furthest	nearest	furthest	

Notes: If a thermostatic mixing valve (TMV) is present, use a surface temperature probe for measuring the temperature at the inlet pipe to the TMV.

Monthly: Record of temperature checks of the hot and cold water cylinders/tanks.

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