



Legionella Management Policy

Version 2 (Draft)

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1.0 Policy for the Management of Legionella Risks

In recognition of its duty under the:

Health & 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)

Fenland District 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 responsibilities for the implementation of this Policy are as follows:

The Chief Executive 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 the Corporate Director of Assets and Projects, as the '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 bi-annually.
- Ensure that the established procedures are brought to the attention of all persons affected by them.
- Appoint the Building Surveyor (Assets and Projects) as 'Deputy Responsible Persons' to implement and coordinate these procedures.

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

Signed

Chief Executive.

V2 Draft

2.0 Understanding Legionnaires' 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 reported cases. On average there are approximately 200-250 reported cases of Legionnaires' disease each year in the UK.

Legionella bacteria are widespread in natural sources of water. They may enter man-made 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 6°C and 60°C. Water temperatures in the range 20°C to 45°C seem to favour growth. The organisms do not appear to multiply below 20°C and will not survive above 60°C. They can remain dormant in cool water and multiply only when water temperatures reach a suitable level.

Legionella bacteria also require 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 favouring the proliferation of legionella are:-

- Moisture
- Temperature between 20°C and 45°C
- 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.

3.0 Legislation and Guidance

In implementing this policy Fenland District 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 & Safety at Work Regulations 1999
- Notification of Cooling Towers and Evaporative Condensers Regulations 1992
- Reporting of Injuries, Diseases & Dangerous Occurrences Regulations 1995

4.0 Managing the Risk: Responsibility Structure

The Chief Executive 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 the Corporate Director of Assets and Projects as the 'Responsible Person' to manage the necessary procedures for the prevention of Legionnaires' disease.

The Responsible Person shall:-

- Accept management responsibility for all aspects of Legionella control.
- 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 bi-annually.
- Ensure that the established procedures are brought to the attention of all persons affected by them.

- Appoint the Building Surveyor (Asset and Projects Team) as 'Deputy Responsible Persons' to implement and coordinate the procedures for the prevention of Legionnaires' disease.

The Deputy Responsible Persons shall:-

- Arrange for Risk Assessments to be carried out on water systems and plant, for each property. The Risk Assessments shall be reviewed bi-annually and when the original assessment may no longer be valid.
- Keep permanent records of all Risk Assessments in the in the relevant property file (Asset and Projects Team).
- Arrange for remedial work to be carried out as highlighted by the Risk Assessment. This work is to be recorded on a Remedial Action Sheet.
- A copy shall be held in the on-site logbook. The records will be kept for 5 years and will be readily available for inspection.
- Put in place water temperature monitoring, cleaning, disinfection and certification routines on water systems and plant, for each property.
- Arrange for water temperature monitoring, cleaning, disinfection, certification routines and non-conformance to be fully recorded.
- Arrange for remedial work to be carried out as highlighted by water temperature nonconformance reports when the control limits are exceeded.
- Keep permanent records of all the remedial work in the on-site logbook, with the Risk Assessments and also in the relevant property file. The records will be kept for 5 years and will be readily available for inspection.

The Health, Safety and Emergency Planning Manager shall:

- Be responsible for providing advice to managers on how to deal with health and safety issues, including advice on more specific risks, such as Legionella,

All Fenland District 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.

5.0 The Estate

The Estate comprises all properties and buildings owned or occupied by Fenland District Council, for which Assets and Projects has responsibility for the planned maintenance. Where Council owned properties are maintained by outside agencies then Assets and Projects and the Responsible Person shall be available to advise the person in control of the building.

Where Council employees occupy leased properties then Assets and Projects and the Responsible Person shall be available to advise the person in control of the employees.

6.0 Managing the Risk: Control Regime

Fenland District 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 60°C & distributed above 50°C. 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 20°C.

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 < 24 hours water use
- Removal of dead ends
- Regular flushing of dead legs, low use outlets and low use showers
- Utilising steam humidifiers in preference to air washers
- 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. Cleaning & 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 weeks duration, by raising the temperature of the distribution system to 60°C 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 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 problems 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.

7.0 Risk Assessments

The Deputy Responsible Persons shall arrange for Risk Assessments to be carried out on water systems and plant, for each property. In order to comply with the ACOP it will be necessary to employ outside consultants with specific training and expertise in legionellosis risk assessment.

The Risk Assessments shall be reviewed bi-annually and when the original assessment may no longer be valid. The water services risk assessment shall 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.

8.0 Monitoring

The Deputy Responsible Persons 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 it will be necessary to employ outside contractors with specific training and expertise in water temperature monitoring.

The following tasks shall be completed at the stated frequencies:-

Service	Task	Frequency
Hot water services	Arrange for samples to be taken from hot water calorifier in order to note condition of drain water.	Annually
	Check temperatures in flow and return at calorifiers.	Monthly
	Check temperatures up to one minute to see if it has reached 50 deg. C in central taps*.	Monthly
	Visual check on internal surfaces of calorifiers for scale and sludge. Check representative taps for temperature (reaching 50 deg. C) on a rotational basis.	Annually
Cold water services	Check tank water temperature remote from ball valve and mains temperature at ball valve. Note maximum temperatures recorded by max/min. thermometers where fitted.	Six monthly
	Check that the temperature is below 20 deg. C after running the water for up to 2 minutes in the sentinel taps.	Monthly
	Visually inspect cold water storage tanks and carry out remedial works were required. Check representative taps on a rotational basis.	Annually

Shower Heads	Dismantle, clean and de-scale shower heads and hoses.	Quarterly

Records of the above are to be fully recorded.

Non-conformity of temperature or cleanliness shall be reported to the Deputy Responsible Person, who shall take the necessary remedial action, which shall be recorded and filed with the risk assessment & property file. The Asset and Projects database shall also be populated with appropriate data and information.

9.0 Action in the event of an outbreak

Legionnaires' disease is not notifiable under public health legislation in England and Wales.

An outbreak is defined as two or more confirmed cases of legionellosis occurring in the same locality within a six month period.

It is the responsibility of the Proper Officer for the declaration of an outbreak. The Proper Officer is employed by the health authority and is usually a Consultant in Communicable Disease Control (CCDC). The Health & 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, CCDC or EHO may make a site visit in their search for the source of the outbreak. The Responsible Person and Deputy Responsible Persons shall co-operate 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.

10.0 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 changes in the control regime or systems that need to be made.

The following team members shall meet at the stated frequencies:-

Responsible Person with the Deputy Responsible Persons and the Health, Safety and Emergency Planning Manager, bi-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

Deputy Responsible Persons with appropriate outside contractors, at six monthly intervals, to consider:-

- 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
- The technical and commercial aspects of the contract generally

Deputy Responsible Persons with Council Procurement staff, to consider:-

- The contract duration
- The call for competition
- The tender evaluation
- The Policy and Procedures shall be reviewed and updated appropriately following changes in legislation.

11.0 Equality

This policy has been Equality Impact Assessed. The policy aims to meet the diverse needs of the workforce, ensuring that none are placed at a disadvantage over others. The Equality Impact Assessment confirms that this policy meets the standards.

Appendix A

Schedule of FDC properties falling within the current Legionella testing regime:

Operational Buildings

Fenland Hall, March
The Base, March
Marine Services Workshop, Wisbech
One Stop Shop, Wisbech

Commercial Properties

South Fens Business Centre, Chatteris
Boathouse, Wisbech

Leisure Buildings

George Campbell Leisure Centre, March
Manor Leisure Centre and cricket pavilion, Whittlesey
Hudson Leisure Centre, Wisbech

Parks and Open Spaces

Pavilion, Barton Road, Wisbech

Others

Hostel 372/374 Creek Road, March
Community House, Southwell Road, Wisbech

Appendix B

Equality Impact Assessment

To be completed and attached to any procedural document when submitted to the appropriate committee for consideration and approval.

	Insert Name of Policy / Procedure		
	Legionella Management Policy	Yes / No	Comments
1.	Does the policy / guidance affect one group less or more favourably than another on the basis of:		
	<ul style="list-style-type: none"> Disability – learning disabilities, physical disability, sensory impairment and mental health problems 	No	
	<ul style="list-style-type: none"> Gender reassignment 	No	
	<ul style="list-style-type: none"> Pregnancy / maternity 	No	
	<ul style="list-style-type: none"> Race 	No	
	<ul style="list-style-type: none"> Religion or belief 	No	
	<ul style="list-style-type: none"> Age 	No	
	<ul style="list-style-type: none"> Sex 	No	
	<ul style="list-style-type: none"> Sexual orientation including lesbian, gay and bisexual people 	No	
	<ul style="list-style-type: none"> Marriage / civil partnerships 	No	
2.	Is there any evidence that some groups are affected differently?	No	
3.	If you have identified potential discrimination, are any exceptions valid, legal and/or justifiable?	N/A	
4.	Is the impact of the policy/guidance likely to be negative?	No	
5.	If so can the impact be avoided?	N/A	
6.	What alternatives are there to achieving the policy / guidance without the impact?	N/A	
7.	Can we reduce the impact by taking different action?	N/A	