



# Legionella

## Policy and Management Procedures

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# INTRODUCTION

Pendle Borough Council In Partnership with Liberata aims to minimise and control the risk from legionnaires disease and this policy & procedures is based on the Health & Safety (HSE) Approved Code of Practice Fourth Edition 2013 (L8)

“Legionnaires Disease - the control of legionella bacteria in water systems “ and HSG 274 Technical Guidance part 1,2,3,

This Policy documents apply to all Service Units and outlines the responsibilities of external contractors and Senior Managers to ensure that statutory duties are carried out.

The occupiers of the Council owned premises that are leased to tenants are responsible for arranging their own risk assessment and monitoring systems.

Liberata Property Services arrange for an external contractor to carry out monthly, quarterly, six monthly and annual checks and it is expected that appropriate Service Units will ensure that responsible person/s are nominated, for the buildings they occupy and manage, to carry out the weekly checks ( if required).

This Policy covers the requirement to ensure that all systems for the storage and distribution of water, including cold feeds to hot water services, plant and/or systems may create the transmit water droplets (that may be inhaled) , are managed so as to prevent the spread of legionella bacteria and subsequent outbreaks of Legionnaires Disease.

Legionella pneumophila (legionella bacteria) can cause Legionnaires’ disease, a potentially fatal form of pneumonia. Infection is normally caused by the inhalation of an aerosol of water droplets (that may be so small that they are not visible) contaminated with legionella bacteria.

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A water system includes all plant/equipment work and components associated with that system, e.g. all associated pipework, pumps, feed tanks, valves, showers, ,heat exchangers, quench tanks, chillers, humidifiers, air washers, spa baths and pools, vehicle washes, wet scrubbers, indoor fountains and water features.

Areas with the highest risk are systems with a temperature between 20°C and 50°C within optimum breeding for bacteria of around 37°C. The presence of sediment, sludge, scale and organic material can act as source of nutrients for legionella bacteria.

Therefore a reasonably foreseeable risk of exposure to legionella bacteria exists in:

- water systems incorporating evaporative condenser;
- hot and cold water systems,
- other plant and systems containing water (which is likely to exceed 20°C) that may release a spray or aerosol during operation, or when being maintained.

## 2.0 Legionella Policy.

Pendle Borough Council in partnership with Liberata aims to minimise and control the risk from Legionnaires ' disease and will:

- Appoint a Responsible Person and Deputy who will have a duty to put in place an action plan to minimise the risk of legionella and to manage the necessary work systems and procedures.
- Identify and assess sources of risk, e.g. where conditions are present that may encourage legionella bacteria to multiply or where there is a means of creating and disseminating breathable droplets, and establish any items of non-compliance
- Arranging a program of routine inspection and testing of water systems, including where needed a program of modification to any deficient systems and equipment, to work toward compliance.
- Implement, amend and monitor precautions for all relevant systems and equipment:-
  - a. To ensure the design of relevant building services for new, refurbished or modified systems is such that the HSE ACOP is followed;
  - b. To maintain record drawings of relevant water pipe work system;
  - c. To maintain operation and maintenance manuals of relevant water and plant equipment:
- Maintain records of maintenance, inspection testing for a period of at least five years.
- Keep all relevant personnel adequately trained in practices and procedures with respect to the control of legionella.

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Pendle Borough Council in conjunction with Liberata Property Services will review the policy every two years or earlier if new knowledge on the subject evolves and new guidance is issued.

*Whereas amendments are proposed, these will be presented to Risk Management working with Group for subsequent review. In the event of an incident, an interim review will be undertaken to check the management systems remain effective*

### 3.0 Responsible Person.

It is the Council's responsibility to provide sufficient information, instruction, training and supervision relating to the control of legionella, in order to provide and maintain a healthy and safe working environment.

The Strategic Director, as the **Duty Holder**, has overall accountability for all aspects of the quality and safety of water supplies and systems throughout Council owned and occupied properties.

The HSE ACOP requires that someone should be appointed to take managerial responsibility and to provide supervision for the implementation of precautions.

The **Responsible Person** for the Council shall be **the Head of Property Operations**.

The **Deputy Responsible Person** for the Council shall be **Liberata Facility and Property Care Leader**.

The function of the Responsible Person, in association with suitable staff/external expert advisors, contractors and maintenance staff as needed, will be –

- To advise on the potential areas of risk and also identify any systems that do not comply with the HSE ACOP (L8);

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- To advise on the necessary (continuing) procedures for the prevention of legionella;
- To monitor the implementation and efficiency of those procedures;
- To review all risk assessments
- To approve and identify changes to those procedures;
- To maintain adequate appropriate records such as water temperature monitoring reports, cold feed, hot and cold water tank disinfection certificates and cold water inspection sheets;
- If any outbreak of legionnaires' disease is suspected or confirmed in a Council Property, to notify the Duty Holder and take all appropriate measures – see 10.0 Procedure for Suspected Contamination by Legionella Bacteria.

## 4.0 Risk Assessment.

- Liberata Property Services will appoint an expert external contractor with a Trade Association Membership of the Water Management Society or British Association for Chemical Specialists (WMSoc/BACS) to carry out risk assessments of the water systems in all Council premises on at least a two yearly basis or if there is reason to suspect that the assessment is no longer valid such as;
- Changes to the water system or pipework have been made
- When new information is published with updates to recommendations and procedures.

Risk assessments will be prioritized by:

High Risk	Type of system, showers and tanks
Medium Risk	Smaller numbers of electric showers
Low Risk	Sinks, toilets and point of use water heaters

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## **5.0 Routine Testing and Inspection of Water Systems.**

### **External Contract**

An expert water hygiene service contract comprising of testing, cleaning, sterilization and bacteriological sampling will be arranged by Liberata Property Services. Details of all maintenance, inspection and testing will be retained on file by Liberata Property Services. Each building and building type will have its own 'file'.

These checks will highlight any deteriorating conditions in the water systems and include:

#### **Monthly**

Check of temperatures in flow and return pipes at calorifiers.

Check of supply near hot taps reaching over 45°C.

Check of temperature at cold taps is below 20°C after 2 minutes.

#### **Quarterly**

Dismantle, clean and disinfect all showerheads and biological hoses on site.

Biological monitoring of water samples.

#### **Six Monthly**

Check of cold water tank temperatures.

Check mains water temperatures at ball valves.

Flush through any emergency showers and eye wash solutions.

Flush through hose reels.

#### **Annual**

Review risk assessments when due and report findings to the Risk Management Working Group.

Check representative taps on hot water system on a rotational basis.



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Visual inspection of cold water tanks and suggest any remedial work.

Check representative taps on cold water system on a rotational basis.

### Service Units Responsibility

Weekly checks **MUST** be carried out by the staff of the other Council Service Units (in buildings where they are not done by hall keepers and caretakers). These checks comprise of flushing all taps in low use areas for a period of not less than three minutes to ensure that no stale water is left in the pipes (including shower heads).

For parks / sports buildings, such as sports and bowls pavilions that are closed for a period of time, a full draw-off of water and purge *of all hot water tanks and systems* should be carried out prior to the start of the new season or re-opening of the building.

Details of the checks should be recorded and forwarded to Liberata Property Services on a monthly basis in order that the 'file' can be kept up-to-date.

## 6.0 Training

Liberata Property Services will arrange for relevant personnel, either in Property Services, or in other involved Service Units, to be trained every two years on legionella and all preventative measures that should be taken. The training course will be provided in accordance with the Water Management Society / British Association for Chemical Specialists (WMSoc/BACS) Codes of Conduct.

## 7.0 Implementation of Precautions.

Recommendations for remedial work/procedures etc, that arise from the risk assessments, will be arranged by Liberata

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Property Services according to the degree of risk, in consultation with the relevant staff of other Service Units if appropriate.

## **8.0 Audit and Review.**

The Responsible Person shall ensure that all risk assessments and remedial actions are carried out in accordance with the latest Water Management Society / British Association for Chemical Specialists (WMSoc/BACS) Code of Conduct.

Contractors will report any defects to Liberata Property Services at the time of testing.

Review meetings will be held with the maintenance contractor on at least a 6 monthly basis to discuss progress with maintenance and remedial actions.

Minutes of these meetings will be made available for inspection by members of the Risk Management Working Group.

Full Risk Assessments and subsequent reviews in accordance with the HSE ACOP L8, will be carried out at each site, as a minimum, on a bi-annual basis.

## **9.0 Implementation of the Policy.**

This policy will be implemented by:

- Appointment and monitoring of an expert external contractor by Liberata Property Services (Facilities Management).
- Training for relevant staff which will be provided by an external competent contractor at least every two years.

- Communication of the policy through the Corporate Management Team.

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- Availability of the policy on the intranet as part of Health and Safety section.

## 10.0 Procedure for Suspected Contamination by Legionella Bacteria.

If any outbreak of legionnaires disease is suspected in a Council Property, the Duty Holder **must** be notified.

The property must be closed and the details of any members of the public within the building must be taken. The Responsible Managerial Person shall normally work in association with the Public Health Laboratory Service and the local Consultants in Communicable Disease Control to search for the source of the causative organism. It is essential that systems are not drained or disinfected before samples have been taken. The Responsible Managerial Persons Role is an important one, identifying the various water systems within the building and, in particular, the points from which samples can be taken.

Easy access to these points is essential. The system in question must then immediately isolated and not used.

An investigating team will be established under the guidance of the Responsible Managerial Person liaising with The Duty Holder.

The investigation will concentrate upon all potential sources of Legionella infection, including:

- The domestic hot and cold water distribution system.
- Showers or spray washing equipment.
- Drainage systems and traps.
- Humidifiers in ventilation systems.
- Cooling coils in air-conditioning systems.
- Any other water based system.

To assist in such investigations, the Responsible Managerial Person must be able to provide details of all associated

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equipment, including all documentation. They must assist by advising the investigating team on the extent of the servicing on the site and by locating taps and sample point.

Information will also be required, such as whether there have been any local excavation or earth moving works, alterations to water supply systems or drainage systems or any other factors which may have a bearing on the site.

The team is responsible for identifying the cause of infection and will advise on cleaning, disinfection, any modifications and long term control measures.

If a Legionellosis outbreak is declared by the Public Health Laboratory Service, a Local Authority appointed officer will lead any investigation.

As part of the outbreak investigation and control, the following requests and recommendations may be made by the enforcing authority:

- To shut down any processes which are capable of generating and disseminating airborne water droplets and keep them shut down until sampling procedures and any remedial cleaning or other works have been done. Final clearance to re-start the system may be required.
- To take water samples from the system before any emergency disinfection being undertaken.
- To provide staff health records to discern whether there are any further undiagnosed cases of illness and to help prepare case histories of the people affected.

Any infringements of relevant legislation may be suspect to a formal investigation by the appropriate enforcing authority.

If a water system is implicated in an outbreak of Legionnaires

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Disease, emergency treatment of that system should be carried out as soon as possible.

## 11.0 Further Advice and Information.

If you need any further help contact:

Liberata Property Services – Tel: 661903

### Useful Publications

(I8) “Legionnaires’ Disease – The Control of Legionella Bacteria in Water Systems”. *Revision 4 2013*

HSG 274 Parts 1, 2 and 3.

Both available from [www.hsebooks.co.uk](http://www.hsebooks.co.uk)

Or HSE Books, PO Box 1999, Sudbury, Suffolk, CO10 6FS

Tel: 01787 881165 Fax: 01787 313995

HSE website [www.hse.gov.uk](http://www.hse.gov.uk)

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