



Legionella Management Policy

December 2017

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Document Version Control

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1. Introduction

Legionnaires' disease (Legionellosis) is a potentially fatal form of pneumonia and everyone can be susceptible to infection. The risk increases with age but some people are at higher risk including:

- people over 45 years of age
- smokers and heavy drinkers
- people suffering from chronic respiratory or kidney disease
- diabetes, lung and heart disease
- anyone with an impaired immune system

The bacterium *Legionella pneumophila* and related bacteria are common in natural water sources such as rivers, lakes and reservoirs, but usually in low numbers. They may also be found in purpose-built water systems such as cooling towers, evaporative condensers, hot and cold water systems and spa pools.

Legionnaires' disease is contracted by inhaling small droplets of water (aerosols) suspended in the air.

If conditions are favourable, the bacteria may grow increasing the risks of Legionnaires' disease and it is therefore important to control this risk, by introducing appropriate control measures.

2. Policy Statement

Bracknell Forest Council (BFC) has a statutory responsibility to protect employees, members of the public and others who may be affected by its' operations or services against the risk of *Legionella* infection, arising from plant, equipment, facilities, work or work-related activities. It will implement the procedures described in this document to ensure that this responsibility is met.

The approved code of practice for the management of risks associated with *Legionella* is 'Legionnaires' disease - The control of *Legionella* bacteria in water systems (L8)'. It is the intention of this policy to comply in full with that document and its' associated guidance documents HSG 274 parts 1, 2 and 3.

3. Purpose and Scope

This policy sets out the strategy that BFC will follow and describes the framework of procedures for achieving and maintaining it. This framework describes the objectives at each stage, specifies the management, operational and specialist responsibilities, and lays down a clear management and communication structure to ensure that it is effective and that it fails safe wherever practicable.

4. Management and Responsibilities

BFC hold a wide ranging property portfolio with complex lines of management. Whilst the duty to maintain and implement the Legionella policy falls under the remit of the Property team, which is part of the Resources Department, the responsibility for various aspects are devolved to specific managers.

The following sets out levels of responsibility for risk management of Legionella across the organisation:

4.1 Duty Holder

The Duty Holder has a responsibility to support this policy by ensuring the allocation of resources including an adequate budget, suitable and sufficient equipment, personnel, time and training.

In particular they will:

- Identify and assess sources of risk
- Eliminate risk where possible
- Appoint appropriate 'Responsible Persons' to oversee, control and coordinate the control of the risk of Legionellosis
- Keep suitable records
- Ensure that there are adequate resources available to control the risk of Legionellosis

The Duty Holder is: **The Chief Executive, Timothy Wheadon**

Address: Easthampstead House, Town Square, Bracknell, RG12 1AQ
 Telephone: 01344 355609
 Email: Chief.Executive@Bracknell-Forest.gov.uk

4.2 Responsible Person

The Responsible Person has been given their authority by the Duty Holder. The position carries with it the authority to put into effect such measures as are required to control the risk of Legionellosis, both as a matter of routine and in the event of a crisis. The Responsible Person has a duty to ensure that Document L8 and all relevant legislation associated with the management and control of Legionellosis are adhered to. The Responsible Person also has a responsibility to ensure records are kept to confirm that this policy has been implemented.

The Responsible Person has the overriding authority for the control of Legionella. They have the authority to instruct, and enforce where necessary, 'Jointly Accountable Responsible Persons' to ensure that all BFC sites meet the requirements of legislation and this policy. The Responsible Person is required to ensure that Jointly Accountable Responsible Persons are trained and competent to carry out the prescribed task on their behalf and to ensure that the Responsible Persons' tasks and requirements are duly met.

The Responsible Person has chosen to appoint a 'Responsible Manager'. The Responsible Manager has been given their authority by the Responsible Person to act on their behalf to oversee the day-to-day management of Legionella control for BFC. The Responsible Person is required to ensure that the Responsible Manager is

trained and competent to carry out the prescribed task on their behalf and to ensure that the Responsible Persons' tasks and requirements are duly met.

The Responsible Person is: **Chief Officer: Property, Steven Caplan**

Address: Easthampstead House, Town Square, Bracknell, RG12 1AQ
Telephone: 01344 352474
Email: Steven.Caplan@bracknell-forest.gov.uk

4.3 Jointly Accountable Responsible Persons

Each council-owned and managed property must have an individual identified as the Jointly Accountable Responsible Person.

For those properties with devolved maintenance budgets, individual Council officers become the Jointly Accountable Responsible Person for their individual premises. For corporate buildings this may be the Building Manager or Service Head and for maintained schools it will be the Headteacher.

The Jointly Accountable Responsible Person assumes the same duties as the Responsible Person for their premises only.

Supported by the Responsible Manager and the appointed Competent Contractor, they also assume responsibility for day-to-day management including ensuring that the scheme of precautions to control the risk of Legionella is implemented fully by competent persons.

A register of Jointly Accountable Responsible Persons for all relevant properties will be held centrally by the BFC Health & Safety manager.

4.4 Responsible Manager

The Responsible Manager, having been given their authority by the Responsible Person to act on their behalf to oversee the day to day management of Legionella control for BFC, has responsibility for overseeing and co-ordinating the implementation of the Legionella Management Policy. This position carries with it the authority to put into effect such measures as are required to control the risk of Legionellosis, both as a matter of routine and in the event of a crisis. The Responsible Manager also has a responsibility to ensure records are kept to confirm that this policy has been implemented. They have the responsibility for day-to-day management including ensuring that the scheme of precautions to control the risk of Legionellosis is implemented fully by competent persons, whether directly employed by BFC, contracted or subcontracted.

In particular they will:

- Oversee the control and management of Legionellosis on behalf of the Duty Holder
- Ensure that Legionella risk assessments are carried out on behalf of the Duty Holder
- Eliminate risk where reasonably practicable
- Control risk where elimination is not reasonably practicable, by devising and implementing a scheme of precautions

- Arrange maintenance, monitoring and management of the precautions controlling the risk, including reviewing the risk assessment if there has been any material change
- Arrange the procurement of competent help, as required, including ensuring that the organisations and individuals deployed are competent and appropriately trained and experienced
- Receive service reports and priority corrective action notifications from the Competent Contractor
- Keep records

The Responsible Manager is: **Chief Officer: Property, Steven Caplan**

Address: Easthampstead House, Town Square, Bracknell, RG12 1AQ
Telephone: 01344 352474
Email: Steven.Caplan@bracknell-forest.gov.uk

4.5 Competent Contractor

BFC will employ a suitably qualified specialist contractor to undertake a range of water hygiene functions. This will include, but is not limited to, periodic water quality sampling and testing, temperature monitoring, servicing of thermostatic mixing valves and preparation of risk assessments, schematic drawings of water systems and Written Schemes of Precautions. They may also provide technical advice and training. All activities to be carried out as recommended in document L8 and specified in detail within the contract documents.

The services of such a contractor will be procured in line with BFC standing orders and will include a qualification procedure to ensure their competence to undertake these specialised tasks.

The current Competent Contractor is: **HSL Compliance Ltd**

Contact: Thomas Carne, National Account Manager
Address: Alton House, Alton Business Park, Ross-on-Wye, HR9 5BP
Telephone: 0845 6046729

The current contract is due to expire on: 31st October 2018.

5. Council Owned and Maintained Schools

Council owned and maintained schools are an integral part of the Council and all of the duties, strategies and procedures contained within this document apply to them equally. However, schools must buy the services of the Competent Contractor and support of the Responsible Manager via the Building Maintenance SLA.

Schools that choose to buy this service can be satisfied that those aspects of their duty to manage Legionella in their buildings will be adequately discharged.

For schools that choose not to do so, then the Headteacher must ensure that suitable provision is made to undertake the tasks that would normally be included as part of that service and ensure suitable records are kept.

Compliance with this requirement will form part of the periodic audits undertaken by BFC's Health and Safety Advisors.

6. Housing

Council owned properties let to housing tenants will be subject to Risk Assessment in accordance with this policy document (section 10.1)

Tenants will be informed of the potential risk of exposure to Legionella and its consequences, and advised of any actions arising from the findings of the risk assessment, where appropriate. Tenants will be advised to inform their housing officer if the hot water is not heating properly or if there are any other problems with the system, so that appropriate action can be taken.

The information guide 'Legionella Risk Management - Tenant Advice' (appendix A) is to be provided to all tenants. This guide advises tenants of the need to regularly clean and disinfect their showerheads

The council will apply the following control measures to all housing properties:

- Flushing out the system before letting the property
- Avoiding debris getting into the system by ensuring the cold water tanks, where fitted, have a tight-fitting lid
- Setting the temperature of the water heaters to ensure water is stored at 60°C)
- Where access to the property is gained for maintenance purposes and/or statutory gas safety checks, the council or subcontracted staff will be required to carry out additional inspection and monitoring tasks described in the Domestic Properties Checklist (appendix B)

7. Training

Council officers and others acting on their behalf must be competent to undertake the tasks associated with their specified duties and responsibilities. This will be demonstrated by ensuring that the minimum levels of training described below are undertaken by the relevant duty holder.

Responsible Person

City & Guilds:

- 1 - Roles and Responsibilities of the Appointed Responsible Person
- 2 - Management of L8 Risk Assessment and Control Schemes

Responsible Manager

City & Guilds:

- 1 - Roles and Responsibilities of the Appointed Responsible Person
- 2 - Management of L8 Risk Assessment and Control Schemes
- 3 - Practical Application of L8 Compliance
- 4 - Developing an Effective L8 Management Plan

Jointly Accountable Responsible Person

BFC:

Responsible Persons Course

Highfields:

Level 3 Award in Legionella (QCF) Control for Responsible Persons

7.1 Review Periods

All training is to be renewed at intervals not exceeding two years.

7.2 Record Keeping

Records of duty holders' training will be held centrally by the BFC Health & Safety manager.

8. Emergency Management Procedures

The following procedures are to be followed in the event of the following occurrences:

8.1 Failing Temperature Control

Where it has been recorded that the temperature control for water systems have fallen outside of the agreed parameters, the Responsible Manager will investigate and take appropriate action to remedy. Where a one off fault has been identified and the rectification has resulted in the correct temperatures being achieved, no further action will be taken. If temperature control consistently fails and the fault cannot be rectified, the Responsible Manager will report to the Responsible Person. Legionella sampling will be instigated and maintained until the system fault can be rectified or until an approved alternative control measure has been implemented and shown to be working.

8.2 Shutdown/Mothballing of Premises

Where premises are not used for prolonged periods, they should not be occupied again until a re-commissioning process has been implemented. That process will be site specific and must be clearly specified before implementation.

8.3 Legionella Bacteria Detected in a Water System

Where a test for Legionella has been carried out and returned as positive then the Responsible Manager shall notify the Responsible Person and the appropriate Jointly Accountable Responsible Person immediately they are aware. They will carry out a risk assessment of the building and its users to determine the next course of action which could be but not limited to, a complete flush through of the water system, pasteurisation of the water system, chlorination of the water system or engineering solutions to remove potential problem to the system. The additional use of continuous biocide treatment and/or point of use filtration may also be considered on a temporary or permanent basis.

Where a positive result has occurred, sampling for the Legionella bacteria will be repeated following remedial works to confirm that those works have resolved the issue. A further failure at this time will necessitate that this procedure be repeated.

9. Record Keeping

Appropriate records of all tests, inspections and works to water systems must be kept for a minimum period of five years. This is to include records of all activities described in the Written Scheme of Precautions for each site.

Generally, records will fall into two categories: those associated with activities implemented by the Responsible Manager and those for activities undertaken by a Jointly Accountable Responsible Person and other on-site staff.

9.1 Responsible Manager

Records maintained by the Responsible Manager include those of testing and inspection activities undertaken by the Competent Contractor and works to water systems undertaken by other contractors employed by BFC.

The Responsible Manager will also maintain a register of dates of when Risk Assessments and Written Schemes of Precautions are prepared and reviewed.

9.2 Jointly Accountable Responsible Person

The Jointly Accountable Responsible Person will maintain records for all site-based activities as defined by the Written Scheme of Precautions, which may include water temperature monitoring, flushing and cleaning regimes.

10. Control Measures

BFC adopts temperature control as its primary control measure, maintaining water temperatures and throughput, configuration and cleanliness so as to avoid conditions under which Legionella can proliferate. All water systems will be maintained to ensure that cold water temperatures below 20°C and hot temperatures above 50°C are supplied to outlets. All stored hot water will be maintained at temperatures of 60°C or above.

Where there is a risk of scalding to service users, especially the young, infirm or elderly, then provision will be made for the installation of thermostatically controlled devices to limit the temperature of the water to which they are exposed. Where such devices are installed, they will be maintained on a frequency defined by the risk assessment taking account of any manufacturer's instructions.

Where temperature control cannot be maintained, an engineering solution will be sought. If this is not viable then alternative methods of control such as dosing with chlorine dioxide may be a suitable alternative.

Steps will also be taken to:-

- Ensure that where possible the release of water spray is properly controlled
- Ensure that water cannot stagnate anywhere in the system by regular movement of water in all sections, by keeping pipe lengths as short as possible and/or removing redundant pipework and dead legs
- Avoiding using materials that harbour bacteria and other microorganisms or provide nutrients for microbial growth
- Keeping the system and the water in it clean

10.1 Risk Assessments

Legionella Risk Assessments, carried out in full adherence to 'BS 8580:2010. Water Quality. Risk Assessments for Legionella Control. Code of practice', will be undertaken at all premises with installed water systems. Those assessments will inform the need for any control measures, which will be detailed in Written Schemes of Precautions.

Risk Assessments are to be reviewed regularly and specifically whenever there is reason to suspect it is no longer valid. Examples include:

- Changes to the water system or its use
- Changes to the use of the building in which the system is installed
- The availability of new information about risks or control measures
- The results of checks indicating that control measures are no longer effective
- Changes to key personnel including the Jointly Accountable Responsible Person or the Competent Contractor
- A case of legionnaires' disease associated with the system

10.2 Written Schemes of Precautions

Written Schemes of Precautions will be prepared for all properties, where it is appropriate to do so. Such schemes will include schematic drawings of the water systems to show and identify the following components:

- All system plant, for example water softeners, filters, strainers, pumps, non-return valves and other outlets, for example, showers, wash-hand basins etc.
- All standby equipment, for example spare pumps
- All associated pipework and piping routes
- All associated storage and header tanks
- The origin of the water supply
- Any parts that may be out of use temporarily
- Sentinel / Sampling points

The Written Scheme will contain instructions for the operation of the system, in both normal and abnormal conditions to include the following:

- A description of the correct plant operation and any precautions to be taken.
- Details of any start-up and shut-down procedures, and plant rotation and flushing requirements for little-used outlets.
- Where appropriate, details of methods statements, e.g. for major tasks such as cleaning operations
- Where appropriate, details of tests that are to be completed on the systems, along with the required frequency of the tests and the acceptable control parameters.
- Details of defects or out-of-parameter results, and logs of appropriate corrective actions.

The effectiveness of Written Schemes are to be reviewed annually by the Competent Contractor.

10.3 Cooling Tower Systems and Evaporative Condensers

These installations are known to present particular risks with regards to the propagation of the Legionella bacterium. However, there are no installations of these types in any BFC buildings.

11. Policy Audit and Review

The Responsible Manager has overall responsibility for taking all reasonable steps to ensure that this policy is complied with. With the assistance of BFC Health & Safety Advisors, periodic audits will be conducted at all BFC sites to measure compliance and record the results. Those results will be reported to the Responsible Manager for action where appropriate, and to departmental management teams via their individual health & safety management meetings.

The policy will be formally reviewed following any material change to the arrangements for its' management or implementation. This is to include changes to key personnel including the Duty Holder, Responsible Person or Responsible Manager, or a change of Competent Contractor.

11.1 Policy Review Record

Reviewed by:	<i>Name and position</i>
Review Date:	
Detail reasons for review and any changes made:	

Reviewed by:	<i>Name and position</i>
Review Date:	
Detail reasons for review and any changes made:	

Reviewed by:	<i>Name and position</i>
Review Date:	
Detail reasons for review and any changes made:	

Appendix A – Legionella Risk Management – Tenant Advice Leaflet

Legionnaires' disease

This leaflet has been provided to inform you about the risks of contracting Legionnaires' disease, and how to significantly reduce this risk.

As your Landlord we have an obligation to ensure you are aware of the possible causes and symptoms of Legionnaires' disease so you can identify any problems easily and report any concerns to us.

What is Legionnaires' disease?

Legionnaires' disease is a potentially fatal form of pneumonia, which can affect anybody. It is caused by the inhalation of small droplets of water from contaminated sources containing legionella bacteria.

Where is Legionella found?

All hot and cold water systems in residential properties are a potential source for legionella bacteria growth. The main areas of risk are where the bacteria can multiply and increase to dangerous levels and then spread, e.g. in spray from showers and taps. Conditions perfect for bacterial growth are where water of between 20°C and 45°C stagnates, and where there is sludge, rust and scale present for the bacteria to feed upon and multiply.

Who is at risk?

Everyone is potentially susceptible to infection but Legionnaires' disease most commonly affects people over the age of 45, smokers and heavy drinkers, those suffering from chronic respiratory or kidney disease, people whose immune system is impaired, and those suffering from long term illness. Not everyone exposed to legionella bacteria becomes ill. Legionnaires' disease is not contagious.

On average, there are approximately 500 reported cases of Legionnaires' disease a year.

The symptoms of Legionnaires' disease are similar to those of flu:

- high temperatures
- fevers or chills
- headaches
- tiredness
- muscle pains
- dry coughs

There is no need for concern. Legionnaires' disease is easily preventable by putting in place some simple control measures.

The information on the next page will help you prevent any potential problems.

Report any deposits such as rust or any unusual matter flowing from your water outlets.

What precautions can I take?

Taking the following simple precautions will help keep you safe:

- Flush through showers and taps for 10 minutes following a period of non-use (i.e. after you have been on holiday or if a room is not in regular use). When flushing the shower, try not to create any spray, either by removing the shower head or by catching the water in a plastic bag and disposing of it carefully
- Keep all shower heads and taps clean and free from a build-up of lime scale, mould or algae growth
- Flush toilet/s with the lid down following a period of non-use
- Drain hoses/pipes after use and keep out of direct sunlight. Flush through for a couple of minutes before filling paddling pools etc.
- Keep Spa's and Hot Tub's clean and free from dirt and debris and check and clean the filters—change the water before use if it is not used often
- Keep stored hot water in your system at a temperature of 60°C or greater (immersion heaters etc.)

Raising the temperature of warm water is one way to control legionella growth, but could also increase the risk of burns and scalding. Please take care especially if you have children.



Appendix B – Domestic Properties Checklist

Bracknell Forest Council – Domestic Properties Water Hygiene Checklist	
Tenant:	
Address:	
Date:	
Checked By:	

Question No.	Question	Response		Comments
		Y	N	
Cold Water Storage				
1.	Does the property contain any cold water storage cisterns?			
2.	Is the storage tank constructed in any metallic components?			
3.	Does the storage cistern have a tight fitting lid?			
4.	Is the storage cistern insulated?			
5.	Does the storage cistern contain any debris, fouling or corrosion?			
6.	Is the stored water temperature below 20°C			
Hot Water Heater				
7.	Does the property contain any of the following types of water heaters:			
	Combination Boiler?			
	Combination Water Heater?			
	Direct fired (gas) Water Heater?			
	Immersion cylinder?			
	Indirect heated calorifier vessel?			
	Other? (specify)			
8.	Is the hot water heater achieving the following temperatures:			
	Combination Boiler - 50°C			
	Combination Water Heater - 55°C			
	All Other Types - 60°C			
9.	Has the water heater temperature been adjusted?			
Water Outlets				
10.	Are the showerheads clean and free from scale deposits?			
11.	Are the tap outlets free from scale deposits?			
12.	Is there any redundant pipework, dead legs or blind ends?			