

# Legionella Control Policy

## Clarity Independent School

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Sandon  
CM2 7SG

**Clarity Independent School is committed to safeguarding...**

*"Our school is committed to our whole-school approach to safeguarding, which ensures that keeping children safe is at the heart of everything we do, and underpins all systems, processes and policies...We promote an environment where children and young people feel empowered to raise concerns and report incidents and we work hard in partnership with pupils, parents and caregivers to keep children safe."*

Clarity Safeguarding Policy September 2024

**Written by Debbie Hanson**  
Head Teacher and Proprietor

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**Updated by Name:** Debbie Hanson

## Legionella Control Policy

Prepared using the HSE publication Managing legionella in hot and cold-water systems

This policy sets out the control of Legionella in hot and cold-water systems in the school, including responsibilities, training, testing and records.

### Policy Statement

Clarity Independent School will undertake to ensure compliance with the relevant legislation with regard to the Control of Legionella in hot and cold-water systems for all pupils and staff and to ensure best practice by extending the arrangements as far as is reasonably practicable to others who may also be affected by our activities.

### 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is often amended and Regulations introduced, the references made in this Policy may be to legislation that has been superseded.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](http://www.education.gov.uk/schools) and the Health and Safety Executive website [www.hse.gov.uk](http://www.hse.gov.uk).

- Health and Safety at Work Act 1974
- Management of Health and Safety at Work Regulations 1999
- Care Standards Act 2000

### Definitions

Legionella is a generic term for a type of bacteria which is common in natural and artificial water systems. Legionellosis is the name given to a group of pneumonia-like illnesses caused by Legionella.

### Management

The School will ensure that:

- Relevant risk assessments are carried out and that control measures are implemented (see below).
- Appropriate training is provided (see below).
- The Legionella Competent Person is appointed and carries out his/her tasks as defined below.



- The Head Teacher is informed of any problems with water or the water system.
- Monitor disinfection procedures where necessary.
- Records are kept for each water outlet of flushing and testing and any disinfection procedures.

## **Legionella Competent Person**

The person who has overall responsibility for Legionella on the premises and acts on behalf of the School to provide the necessary competence to enable Legionella to be managed safely is:

**Debbie Hanson, Head Teacher**

The nominated competent person and is also trained in Legionella prevention is:

**Site Manager**

He/she takes an active, daily, practical part in this. In their absence, the role reverts to the Head Teacher.

- The Legionella Competent Person is to complete training as defined in the Information, Instructions and Training section (below).
- He/she will ensure that all periodic and exceptional recording, flushing, cleaning and general Legionella management tasks are correctly completed and recorded in accordance with this policy.
- He/she will advise the staff of any condition or situation relating to Legionella which may affect the safety of any premises users.
- He/she is to work within their level of competence and seek appropriate guidance and direction as required.

## **General Information**

### **What is legionella?**

Legionella bacteria is commonly found in water. The bacteria multiply where temperatures are between 20-45°C and nutrients are available. The bacteria are dormant below 20°C and do not survive above 60°C.

Legionnaires' disease is a potentially fatal type of pneumonia, contracted by inhaling airborne water droplets containing viable Legionella bacteria. Such droplets can be created, for example, by: hot and cold-water outlets; atomisers; wet air conditioning plant; and whirlpool or hydrotherapy baths.



Anyone can develop Legionnaires' disease, but the elderly, smokers, alcoholics and those with cancer, diabetes or chronic respiratory or kidney disease are at more risk.

[Health and Safety England](#) provides information on Legionnaires' disease, the risks in water systems and their management:

- 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 distributes hot water above 50°C. Users are protected from scalding by controlling the delivery temperature of hot water from a tap to approx. 43°C by the use of thermostatic mixing valves. Monthly checks are required to ensure that the valves are working correctly, and records are kept scrupulously.
- All illnesses due to the legionella species are known collectively as "Legionellosis" but the most well-known is "Legionnaires' disease" which can be serious for elderly people and others with respiratory problems or immuno-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.

## Risk Assessment

Assessment of risk is mostly confined to:

- Monitoring whether control measures are being instigated fully
- Correct water temperatures are being maintained
- Engineering measures, such as temperature control valves, are working properly

## 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:



- Monitor any water outlets that are not in regular use.
- Record the flushing of all water outlets.
- Record the temperature of hot and cold-water outlets.

## Testing Arrangements

Under certain circumstances, for example when there have been alterations or maintenance work to the water system, testing is to be carried out.

Disinfection of the system will be necessary when testing indicates there is a sufficient level of legionella present in the water system to require treatment.

Full details of flushing and testing regimes that need to be carried out can be found in the procedures below.

## Information, Instructions & Training

- Clarity Independent School will ensure that suitable and sufficient training and information is given to the Legionella Competent Person, and any other member of staff, who has responsibilities for flushing, record keeping and taking temperature readings as required by the appendices.
- Any new measures that are introduced to control legionella will need appropriate training provision.
- Clarity Independent School will maintain a written record of all instruction and training given to members of staff.

## Procedures to Mitigate Risk

### Flushing and Temperature Testing Procedures

#### Flushing

1. All water outlets (hot & cold) will be flushed through weekly (but see para 3. below) and a record will be kept in writing on the water outlet flushing checklist by the person carrying out the flushing.
2. Flushing will last for at least two minutes at a reasonable flow rate.
3. 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.

#### Temperature Testing

A single cold and hot tap on the main hot and cold-water systems, which are not connected via a thermostatic mixing valve (TMV), are each to be run for at least two minutes every month so that a temperature can be taken using a thermometer and recorded on the Water Temperature Check List.

**The cold-water outlet temperature should be below 20°C after two minutes running. The hot water outlet temperature should be above 50°C after two minutes running (unless a TMV is present, in which case the pipe temperature is measured).**

If these temperatures cannot be maintained, then the professional assistance must be sought immediately.

Please note, there is no storage of water on the premises as we have a combi boiler, which heats and distributes water from cold mains as it is used. The drinking water (bottled) chiller is also sanitised each 3 months using the appropriate commercial kit.

Scientific tests may be required when there appears to be a problem with the water supply, e.g. discolouring, temperature problems, etc.

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.

## Scheme of Control

### Weekly

- 1) Hot water flush of drinks boiler in staffroom
- 2) Flush cold water outlets if not used for more than 4 days

### Monthly

- 1) Take all temperatures at sentinel outlets (taps)
- 2) Take temperature at supply to TMV (pipe supplying hot water using probe thermometer)
- 3) Check all taps for limescale and treat as necessary

### Quarterly

- 1) Showers- clean and descale all heads, record on quarterly record sheet
- 2) Inspect health and safety log-book and review management procedures

### Annually

Annual heating service of boiler to retain efficiency

### Assistance

Assistance with testing and enquiries can be sought from Smartwater testing - [www.smartwatertesting.co.uk](http://www.smartwatertesting.co.uk) 0800 612 8141.

**Staff are invited to comment on this policy and to suggest ways in which it may be improved, by contacting the Head Teacher who will discuss this with the SLT.**

This policy will be updated annually in accordance with relevant guidance and regulations.

Overall responsibility for legionella control in **Clarity Independent School** rests with the Head Teacher, Debbie Hanson.



### Cold-water temperature (monthly)

*Temperature should be less than 20°C within 2 minutes of running tap*

Date	Cold tap flushed for 2 minutes, does it reach lower than 20°C								Action needed? / taken	Signed
	Staff-room	Medical room	Class 3	Staff WC	Disabled WC2	Shower	Disabled WC1	Kitchen		

*Stored in desktop -> policies -> final do not change -> Legionella -> Policy Documents*





### Half termly cold-water flushing or if not used after 4 days

Date	Cold tap flushed for 2 minutes, does it reach lower than 20°C								Action needed? / taken	Signed
	Staff-room	Medical room	Class 3	Staff WC	Disabled WC2	Shower	Disabled WC1	Kitchen		

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## Hot-water temperature for pipes and water flow (monthly)

Temperature of pipe and hot water where no TSM should reach more than 50°C within 1 minute of running water.

Temperature of hot water (after TSM) should reach no more than 43°C.

\*TSM = Thermostatic Mixer

Date	Pipe / water	No TSM, therefore hot water should be above 50°C		TSM present, therefore hot water should be no higher than 43°C						Action needed? / taken		Signed
		Staff-room	Kitchen	Medical	Classroom 1	Staff WC	Disabled WC2	Shower	Disabled WC1	OK?	Action?	
	Pipe	X	X					X				
	Water flow											
	Pipe	X	X					X				
	Water flow											
	Pipe	X	X					X				
	Water flow											



## Water Cooler and Dispenser Sanitisation 3-Monthly

The Sanitisation Kit is in the Caretaker's Cupboard. Re-order from [www.thewaterdeliverycompany.com](http://www.thewaterdeliverycompany.com)

Water Cooler Location	Date	Faults?	Action plan?	Complete	Initials

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## **Ariston Hot Water Flush of Drinks Boiler in Staffroom** **Weekly/Half-Termly**

Turn the heater off in the staffroom. You will find this located just under the heater, to the left, behind the fridge. You don't need to pull the fridge out to access the switch.

When turning the heater back on, flush roughly 4 litres of cold water. Turn the heater on by the switch behind the fridge, once fully heated (the red light comes on on the front of the heater) flush another 1 litres of hot water through.

The water heater is now ready to use.

<b>Date</b>	<b>Turn off before weekends &amp; before holidays</b>	<b>Turn on after the weekend</b>	<b>Drain, turn on, drain again, upon return from holidays (see instructions above)</b>	<b>Sign</b>