



The Blue Coat School

CONTROL OF LEGIONELLA POLICY

Approved by the Governors' Safeguarding, Health and Safety Committee

Signed: _____

(K Gilmore – Chair of Safeguarding, Health & Safety Committee)

Date: _____

This Control of Legionella Policy was devised by the Bursar and The Estates & Compliance Manager in consultation with colleagues in the school.

Date of Next Review: Lent 2026

CONTROL OF LEGIONELLA POLICY

1. AIMS AND OBJECTIVES

1.1

The Policy defines how The Blue Coat School (the School) will manage the potential risk from Legionella and water hygiene contamination in accordance with current legislation and best practice.

1.2

The purpose of the Policy is to comply with legislation and associated information which governs this documentation:

- The Health & Safety at Work Act 1974;
- The Control of Substances Hazardous to Health (COSHH) Regulations 2002 (as amended following Brexit);
- The H.S.E. Approved Code of Practice and guidance The Control of Legionella Bacteria in Water Systems (ACOP L8); and
- BS8550 2010 Water Quality Risk Assessments for Legionella Control – Code of Practice.

1.3

This Policy and associated procedures will apply to all buildings and all individuals employed and/or engaged by the School without exception.

2. PROCEDURES

2.1 General

2.1.1

The School has responsibility for compliance with the Health and Safety at Work Act 1974 and all associated legislation. This includes specific legislation relating to Legionella and water hygiene, as set out in Appendix I.

2.1.2

The presence of Legionella bacteria in water does not itself constitute a danger. For example, the presence in drinking water does not pose a risk whilst it is used for drinking or washing.

2.1.3

The mode of contracting the disease is by inhalation of water in an aerosol. An aerosol may be caused by spraying, showering, running taps etc.

2.1.4

The School shall:

- Identify and assess the sources of risk;
- Prepare a scheme for preventing or controlling the risk;
- Ensure suitable and sufficient resource are available;
- Implement, manage and monitor all precautionary control measures identified;
- Keep records of all such measures;
- Nominate employees and others with responsibility for implementing this policy;
- Review this Policy at least every three years.

2.1.5

Responsibility for ensuring compliance with this legislation within the school for fixed water systems has been delegated to the Bursar who is responsible for any non-fixed equipment.

2.1.6

Responsibility for the implementation of the Control of Legionella bacteria within water systems (Policy and Procedures), along with the management of Legionella rests with the Duty Holder (Chair of Governors).

2.2 Risk Assessments: Water Hygiene

2.2.1

The School shall:

Conduct risk assessments with schematics to remove risks posed by Legionella bacteria. This duty and responsibility will be designated to the competent external contractor engaged to do such works.

2.2.2

Employ qualified and competent persons to carry out the risk assessments on its behalf, hence the reference in the line above to the external contractor.

2.2.3

A risk assessment of fixed water systems will be conducted culminating in a risk assessment report with schematic drawings and water log books for each site.

2.3 Audit and Review

2.3.1

The risk assessments are to be audited and updated every three years or more frequently if Legionella bacteria are found to be present on sampling water systems. Further information on specific procedures is detailed in Appendix I.

3. INDIVIDUAL RESPONSIBILITIES

3.1 Statutory Duty Holder – Chair of Governors

3.1.1

The Duty Holder will ensure that all appropriate personnel are familiar with the contents of this Policy and the procedures insofar as it is relevant to their roles and responsibilities.

3.2 Headmaster

The Headmaster will:

- Ensure compliance with this Policy and associated procedures by those staff within the School who use, maintain or teach using water systems and equipment that uses water such as plumbing systems, hose pipes and sprinkler systems;
- Facilitate and monitor inspection work; and
- Ensure that no modifications/alterations or additions to water systems are carried out, unless written approval is obtained from the Bursar.

3.3 Responsible Person – Bursar

The Bursar will:

- Ensure compliance with this Policy and associated procedures by those staff within the School who use, maintain or teach using water systems and equipment that uses water such as plumbing systems, hose pipes and sprinkler systems;
- Review and update the Policy;
- Monitor compliance of the programme to current legislative requirements;
- Instigate a review every three years and, where required, investigate and report to the school Safeguarding, Health and Safety Committee on any alleged incident of accidental Legionella exposure, and also ensure correct reporting of incidents under RIDDOR, where appropriate;
- Liaise with School Matron if incidents of Legionellosis are diagnosed as regards staff or pupils;

- Attend accredited Legionella Awareness and Legionella: The Role of the Responsible Person training courses;
- Ensure systems are designed and installed to ensure compliance with the L8 document;
- Facilitate any monitoring or inspection work;
- Ensure appropriately trained personnel available for L8 compliance works;
- Ensure that no modifications/alterations or additions to water systems are carried out, unless discussions take place with the water hygiene contractor where necessary.

3.4 Water Hygiene Consultant – External Contractor

The Water Hygiene Consultant will be expected to:

- Advise on all School water quality matters in order with the ACOP L8 document;
- Audit performance of the contract using an audit check list to review;
- Provide risk assessments, schematics, chlorination and other relevant and necessary activities;
- Carry out tests, as required, or as instructed on water systems;
- Carry out investigations and remedial works as instructed;
- Carry out all regular inspection/monitoring/maintenance tasks as instructed; and
- Ensure all necessary documentation is completed.

4. RELATED POLICIES, MONITORING AND POLICY REVIEW

4.1

This Policy should be read in conjunction with the Health and Safety Policy.

4.2

The Policy will be reviewed every year (or as required in the event of an incident) to ensure that it complies with statutory requirements and to ensure that any changes in practices are accurately reflected. It will be presented to the Governors' Safeguarding, Health and Safety Committee for approval in the Lent Term. The minutes of these meetings will be presented to the Full Governor Body.

APPENDIX I

RELEVANT LEGISLATION, GUIDANCE AND STANDARDS

Health & Safety At Work Act 1974: Places general duties on employers and self-employed persons to ensure, so far as is reasonably practicable, the health, safety and welfare of all their employees, and persons other than their employees who may be affected by any of their undertakings. Employers must also ensure that the premises, and any plant or substance therein, are safe and present no risks.

Relevant legislation, guidance and standards to manage Legionella are set out below:

HSE Approved Code of Practice ACOP L8 (rev): The control of legionella bacteria in water systems. Provides technical guidance on the management of water systems for Legionella control.

BS6700: Design installation, testing and maintenance of services supplying water for domestic use within buildings and their curtilages.

Control of Substances Hazardous to Health Regulations (COSHH) 2002 (as amended): COSHH applies to substances that are hazardous to health, including pathogenic organisms found in the workplace and place specific responsibilities on employers, self-employed persons and employees. The regulations require suitable and sufficient assessment to be made of the risks and measures necessary to control substances hazardous to health arising from work. Employers are also required to maintain the control measures, to provide information, instruction and training in relation to these issues, to monitor exposure of the employees to the substances and, where relevant organise a health surveillance programme.

Water Supply (Water Fittings) Regulations 1999

With guidance from **Water Regulations Advisory Scheme (WRAS)** these provide an explanation of the water fittings regulations. Part of the WRAS guidance is provided in the **Water Fitting and Material Directory** which has information on materials that have been tested microbiologically and chemically and have been found to be appropriate for use with water systems.

Water Supply (Water Quality) Regulations 2000

These regulations provide water suppliers with statutory limits on water quality with information on sampling, testing and monitoring frequency.

Private Water Supplies Regulations 2011

These regulations provide private suppliers with statutory limits on water quality with information on sampling, testing and monitoring frequency.

BS8580 Water Quality: Risk Assessment for Legionella Control Code of Practice

This standard provides recommendations for risk assessments for legionella control in artificial water systems, covering the preparations, desktop appraisal, site visit and/or survey, reporting and review.

COLD WATER TANKS – REQUIREMENT

Storage tanks are to be inspected annually by the competent external contractor with consideration to thermal insulation, lid condition, cleanliness, ball valve operation, overflow condition and general condition. Water temperature from the ball valve and tank must be tested.

PROCEDURE FOR FLUSHING INFREQUENTLY USED OUTLETS.

1. Identify little used outlets to be flushed
2. Ensure aerosol generation is kept to a minimum by the employment of plastic sheaths or additional pipe-work to drain if necessary
3. Flush outlet for a timed period of 5 minutes
4. If water is discoloured report it to the Bursar
5. Complete all necessary documents.