

Legionella

Schools Safety Guide

Document information

Document title	Legionella SSG		
Owner	SMBC - Corporate Health & Safety Unit		
Status	Live	Version	1
Effective from	April 2019	Approved on	April 2019
Last updated	March 2019	Last updated by	HSU/KJ
Review date	April 2022		
Purpose	To give head teachers and senior leadership team the knowledge and guidance to successfully manage the risk from the school premise water supply		

Contents

Introduction	3
The Law	3
Responsibilities	3
Identifying, assessing and controlling the risk	4
Implementing controls	4
Competent persons	5
Record keeping	5
Design, manufacture, supply and installation of water systems	6
Further information	6

Introduction

Legionella bacteria is the causative agent for a range of diseases including legionnaires disease which is a potentially fatal form of pneumonia.

Legionella bacteria are widespread in natural and purpose-built water systems and outbreaks of illness occur where systems allow for the growth of, and exposure to the bacteria. This is where systems provide water in the temperature range of 20°C - 45°C and allows for the creation of water droplets and aerosols that can be inhaled.

This guide outlines the legal framework for managing this risk and the things schools need to do, it covers the;

- Identification and assessment of the risk of exposure to legionella bacteria
- the preparation of and implementation of written schemes of control
- the monitoring arrangements to ensure controls remain effective
- the records to be made and kept to evidence implementation and control
- the need to appoint competent persons to assist in taking the measures needed to comply with health and safety law relating to legionella bacteria
- considerations when designing, supplying and installing water systems

The Law

The Control of substances hazardous to health regulations (COSHH) require duty holders to identify and make a suitable and sufficient risk assessment of substances hazardous to health in the context of work activity. This includes legionella bacteria.

Responsibilities

The approved code of practice (ACOP) [Legionnaires' disease L8](#) (HSE) places the responsibility on the **duty holder** for ensuring that the requirements of the ACOP are carried out, where the duty holder is;

- the employer, and where the risk from the undertaking is to their employees or others

and;

- the person in control of premises or systems in connection with work, where there is a risk from systems in the building e.g. where a building is let to tenants, but the Council retains responsibility for maintenance.

In the case of schools, the duty holder will be the;

Local authority for community schools, community special schools, voluntary controlled schools, maintained nurse schools and pupil referral units

Governing body for foundation schools, foundation special schools, voluntary aided schools

Governing body or proprietor for Independent schools

The Academy Trust for Academies and free schools

The ACOP goes on to say that the duty holder should appoint a competent person or persons to take day to day responsibility for controlling identified risks from legionella bacteria, this person being referred to as the 'Responsible Person'.

Schools will need to appoint "responsible person(s)" and depending on the extent of control exercised by schools in managing the risk from legionella bacteria, the responsibilities may cover;

- The appointment of competent persons to undertake a risk assessment for legionella bacteria
- The appointment of competent persons to undertake monitoring and routine inspections of water systems in line with written scheme requirements
- Ensuring risk assessments are carried out and written schemes produced
- Ensuring routine monitoring is implemented
- Ensuring legionella positive samples are reacted to appropriately
- Ensuring all remedial actions are implemented
- Keeping the necessary records
- Ensuring the schools site responsible person is suitably trained to carry out their role

All duty holders and responsible persons should make themselves familiar with the requirements of the ACOP

Identifying, assessing and controlling the risk

Schools need to ensure that;

- a risk assessment is carried out on their water systems to identify and assess the risk of exposure to legionella bacteria and that the risk assessments are reviewed to ensure they remain valid and;
- Where the assessment identifies a reasonably foreseeable risk of exposure to legionella bacteria that a written scheme specifying the measures to take to prevent or control the risk is produced.

This type of risk assessment requires specialist knowledge of water systems and legionella bacteria and is best left to the services of a competent person

Implementing controls

Written schemes will identify the precautions to take to control the risk of exposure to legionella bacteria, this may include;

- Modifications to water systems such as removal of dead legs, labelling of system components, tank replacements etc

- The operational control and treatment regime such as temperature control, flushing of little used outlets, chemical treatments etc
- Monitoring and routine inspections required to ensure the treatment regime continues to control the water system to the required standard, such as checks on the performance and operation of the system and inspections for damage and signs of contamination
- Water sampling and testing requirements

Written schemes of control will outline what is to be done and by who.

Competent persons

Schools may have access to competent persons through their employer or partner organisation e.g. Local Authority building services function, PFI/BSF Facilities management provider who will arrange for the risk assessment and written schemes to be done on behalf of the school.

Schools who don't have access to such resources need to ensure they appoint a competent person (e.g. a member of the [Legionella Control Association](#)) to undertake the risk assessment and develop the written scheme of control and to undertake monitoring activities.

It is important that the persons appointed to undertake the monitoring activity are different to those appointed to complete the risk assessment to avoid a conflict of interests.

Schools must ensure that their competent person(s) shares the significant findings of the risk assessment with the school and provide instruction and training to relevant school employees to enable them to undertake tasks assigned to them in the written scheme of control.

School employees involved in the management of water systems need to have the required competencies to be able to full-fill the responsibilities placed on them.

Record keeping

Schools must keep records to demonstrate control over the risk of exposure to legionella bacteria. Records include:

- Risk assessment
- Written scheme
- Record of treatments

The records above will be kept on the site to which they refer by the nominated site responsible person throughout the period they are current and for at least 2 years afterwards.

In addition, records of any monitoring, inspection, test or check carried out will be kept for at least 5 years from the date of the record.

Design, manufacture, supply and installation of water systems

Schools should consult with their appointed competent person when contemplating any work on or installation of new water systems to ensure the risk assessment is updated and the work and/or systems comply with recognised best practice.

Further information

Further information on controlling of legionella in schools can be found on the HSE web site: <http://www.hse.gov.uk/legionnaires/index.htm>