

At Great Heights Academy Trust we are committed to the health and safety of our staff, students and visitors. Ensuring the safety of our Academy community is of paramount importance to us and this policy reflects our dedication to creating a safe learning environment.

This policy has been created to ensure The Trust is in compliance with all legislative requirements with regard to the control of Legionella in water systems for all employees and pupils. The Health and Safety at Work Act 1974 and The Management of Health and Safety at Work Regulations 1999, in addition to the Care Standards Act 2000, provide the legislative basis for this policy.

In addition, this policy highlights our arrangements to extend best practice, as far as is reasonably practicable, to all others affected by our activities.

## **1. What are the risks?**

- 1.2 Legionnaires' disease is a potentially fatal form of pneumonia caused by the inhalation of water droplets infected with the Legionella bacteria.
- 1.3 Legionella bacteria can occur naturally in lakes, rivers etc. and in the water systems of buildings, such as schools.
- 1.4 The bacteria thrive between 20°C and 45°C but can be killed by elevated temperatures or chemical treatment methods.
- 1.5 Control is commonly achieved through suitable maintenance of the water system and its plant. Water storage procedures, preventing the bacteria from proliferating, also provide additional control.
- 1.6 Those at high risk of infection include: those over 45 years of age, smokers, heavy drinkers, those suffering from chronic respiratory or kidney disease and those with impaired immune systems.

## **2. Roles and responsibilities**

- 2.2 The overall responsibility for the safety of all members of the school community lies with the Trust.
- 2.3 The Principal in each academy is responsible for the day-to-day implementation of the Policy, namely:
  - 2.3.1 Prepare and implement a written scheme for preventing and controlling the risk of Legionella.
  - 2.3.2 Implement and manage the scheme.
  - 2.3.3 Ensure appropriate training is provided.
  - 2.3.4 Ensure that the testing and flushing of water outlets is carried out as outlined in Appendix 2.
  - 2.3.5 Carry out a Legionella Risk Assessment.
  - 2.3.6 Keep records of all flushing, testing, disinfection procedures and certification for a minimum of 5 years.

2.4 However, this responsibility may be delegated to a member of staff e.g. Site Manager or third party company. In addition the Trust's Chief Operations Officer (COO) will provide guidance, advice and monitoring to all Trust sites.

### **3. Incident reporting**

3.2 All incidents of Legionella will be reported as soon as possible to the nominated member of site staff using the standard Accident Report Form.

3.3 The member of site staff will be responsible for informing the Principal as outlined by the Health and Safety Executive (HSE). The notification will cover:

3.3.1 Details of the sample.

3.3.2 The organism present in the sample.

3.3.3 Location.

3.3.4 Advice on appropriate remedial measures.

3.4 If a member of the school community is taken ill following exposure to Legionella, the COO will be notified immediately.

### **4. Reporting procedure**

4.2 Should an incident require reporting to the Incident Control Centre (part of the HSE) the COO, or a person appointed on their behalf, will file a report as soon as is reasonably possible.

4.3 The person will complete the RIDDOR form 2508 online here:

<https://extranet.hse.gov.uk/lfserver/external/F2508IE> or,

4.4 The person will complete the RIDDOR form 2508 and send it off to the ICC by post or fax. To:

**ICC**

**Caerphilly Business Park**

**Caerphilly**

**CF83 3GG**

4.5 Alternatively, the person will complete the RIDDOR form 2508 and report the incident via telephone on 0845 300 9923 (open Monday to Friday 8.30am to 5pm).

### **5. Accident investigation**

5.2 All occurrences of legionella, however small, will be investigated by an appointed party and the outcomes recorded.

5.3 The length of time dedicated to each investigation will vary on the seriousness of the occurrence.

5.4 After an investigation takes place, a risk assessment will be carried out, or the existing assessment amended, to avoid reoccurrence.

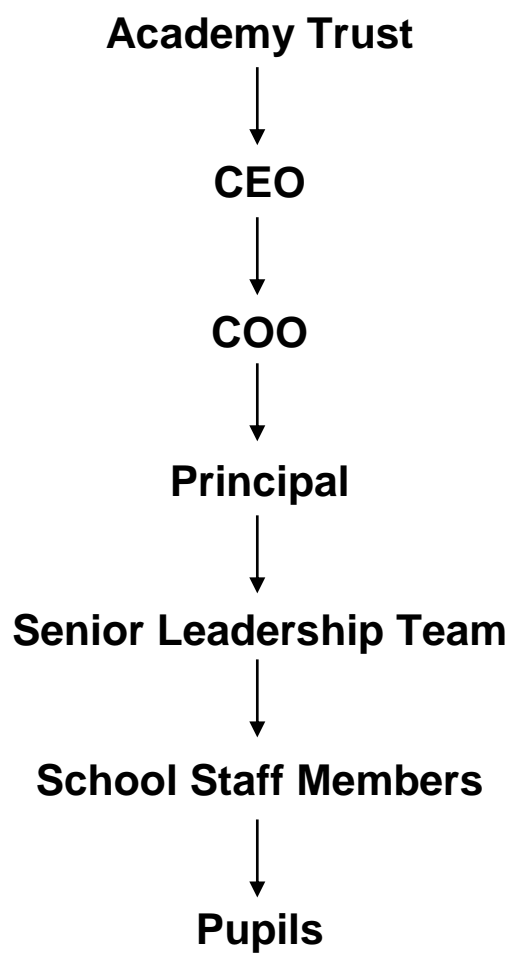
### **6. Risk assessment**

6.2 The Principal has overall responsibility for ensuring potential hazards are identified and for ensuring risk assessments are completed for all areas of risk in the Academy.

- 6.3** Bi-Annual risk assessments will take place exploring the risks of legionella in the Academy, or whenever a new water system is introduced.
- 6.4** The Caretaker/Premises Manager or third party company is responsible for carrying out the risk assessments.
- 6.5** The risk assessments will investigate whether:
  - 6.5.1** Control measures are being instigated fully.
  - 6.5.2** Correct water temperatures are being maintained.
  - 6.5.3** Engineering controls, such as temperature control valves, are in working order.
- 6.6** All failures will be immediately reported to the Principal.
- 6.7** The Academy Trust will be informed of risk assessments allowing issues to be prioritised and actions to be authorised along with funds and resources.

## Appendix 1

### Health and Safety Structure



# Appendix 2

## Flushing, Temperature Testing and Disinfection Procedure

### Flushing

1. All water outlets are flushed through once weekly and a written record is kept in writing on a water outlet flushing checklist.
2. Flushing will last a minimum of two minutes and be conducted at a reasonable flow rate.
3. Routinely used water outlets do not require additional flushing as the use acts as a flushing measure.
4. Flushing will always be required for all water outlets following periods of non-use of four days or longer, except where disinfection procedures apply.

### Temperature Testing

1. A single cold and hot tap on the main water system, not connected to a thermostatic mixing valve, are each to run for at least two minutes every month so an accurate temperature can be taken using a thermometer.
2. The temperature will be recorded on the Water Temperature Checklist.
3. A cold water tap should be below 20°C after two minutes running.
4. A hot water tap should be above 50 °C after two minutes running.
5. If the temperature does not meet these requirements, the Principal/Business Manager/Premises Manager will be informed immediately.
6. Further scientific tests may be required when there appears to be a problem with the water supply.
7. If a positive Legionella test is reported, there will be a re-test every 3 or 6 months until two consecutive clear readings are established.

### Disinfection

1. Following a sufficiently high result after testing, the water supply will be disinfected by an approved contractor.
2. The Caretaker/Premises Manager will arrange the time and date of disinfection with the selected contractor.
3. Affected areas will be withdrawn from use until disinfection has been completed.
4. Flushing of affected outlets will cease until the disinfection is complete.
5. Clean water for the kitchen area will be sourced from an uncontaminated supply on the morning of disinfection.
6. Drinking water must only be drawn from the alternative supply.
7. Alternative hand cleaning methods will be instigated such as antiseptic wipes.
8. Staff and pupils will be protected from accidental use or contact with disinfected water by the use of security measures.
9. Once disinfection commences, the water system will not be usable until it is declared safe by contractors. Disinfected areas will be immediately re-instated following the completion of the disinfection process and a declaration of safety issued.

### Links to Other Policies:

H&S Policy

Reviewed April 2022.