Norfolk County Council

Legionella control and water hygiene management compliance code P616

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1.0 Introduction
This document provides information on legionella risks and required management actions.

2.0 Scope
This compliance code applies to those with premises management responsibilities, including those with a role in ensuring the upkeep of a premises, such as business managers and caretakers.

3.0 Responsibilities
All managers and employees must follow the procedures outlined in this Code in order to carry out their duties and as outlined in the school's Health and Safety Policy.

4.0 Overview of Legionnaire's disease
Legionnaire's disease is a potentially fatal form of pneumonia. Those most at risk include smokers, alcoholics and people with cancer, diabetes and chronic respiratory complaints or kidney disease.

The most likely infection route is through direct inhalation of bacteria carried by water droplets as an aerosol, and which can penetrate deep into the lungs. Infection begins quite abruptly with flu-like symptoms, accompanied by a dry cough which soon develops. Many people experience difficulty with breathing. The disease is effectively treated with specific antibiotics but the diagnosis can only be determined by laboratory tests.

Legionella bacteria occur naturally in locations such as rivers, lakes, and reservoirs, but in the right conditions it can also be present in domestic water systems, e.g. water tanks and supply pipework, and released at the point of use, e.g. taps, shower heads etc. Whirlpool spas are a particular risk when not installed or maintained correctly. Growth will be encouraged where water ceases to flow or becomes contaminated with materials that may provide a source of nutrition. Temperature also plays an important role.

Effect of temperature on legionella lifecycle

70 ºC	60 ºC	50 ºC	Between 37ºC and 46ºC	Below 37ºC	Below 20ºC
Killed instantly	Lives for about a minute	May live for hours	Optimum temperature for reproduction	Reproduction rate decreases	Reproduction rate is insignificant

5.0 Requirements for managing Legionella
Each premises must:

- Have a legionella risk assessment identifying and evaluating potential risk sources (remedial works may be identified in the assessment and these must be followed up by the Premises Manager).

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- Have a scheme for preventing or controlling any identified risk
- Have appropriately trained staff
- Keep records of actions taken to implement this scheme, including remedial works, monitoring and maintenance checks

6.0 Arrangements for legionella management of BMF/BMP member sites

For sites not covered by the BMF or BMP4, the site management team will need to put their own equivalent arrangements in place.

6.1 Legionella risk assessment and logbook

Risk assessment - An NPS appointed contractor will undertake a legionella risk assessment every five years. A hard copy will be provided to each site within a risk assessment folder. The main risk assessment document is in section 4.0 of the folder, the first page of which provides the risk rating for the site and an overview of the issues.

6.1.1 Key information from the risk assessment is presented at the very front of the folder as follows:

- A short introduction covering the purpose and scope of the assessment
- The specific remedial works required for the site (see 6.2 below)
- The specific monitoring actions required for the site (see 6.3 below)

Logbook – A logbook will also be provided. This will include sheets for any checks, inspections and monitoring works carried out both by premises staff and contractors. These sheets will be tailored to each site.

Organising your paperwork – To make this easier, you may decide to move the logbook sheets so that they are kept with the ones outlining the remedial works and monitoring actions referred to in 6.1.1. Although this isn't a requirement, you may find doing this helps ensure all your working documents are in one place and can be more easily retrieved.

6.2 Remedial actions

The risk assessment will identify any parts of the water system presenting an increased risk of legionella growth, e.g. redundant pipework where water can stagnate, missing water tank lid that might allow contamination, storage temperature set too low etc. Premises managers must develop a plan to address these and the action should be signed off and dated as confirmation as they are completed.

6.3 Monitoring actions (the written scheme for controlling legionella risk)

Arrangements should also be in place for carrying out the required monitoring actions identified in the risk assessment. This may include weekly flushing of seldom used services, temperature checks of hot and cold water supplies, cleaning of shower heads, de-scaling of taps etc. Forms will be tailored for each site to record these and will form part of the legionella log book issued to each site by the contractor.

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Where monitoring highlights issues e.g. water temperature compliance, you should raise these with your property surveyor as it may be that additional remedial works are required such as raising the storage temperature of water.

In addition to routine monitoring checks carried out by premises staff, an NPS appointed contractor will undertake six monthly and annual visits to carry out more specialist checks.

6.4 Annual monitoring and risk assessment review

The annual monitoring visit will entail:

- Looking at the existing legionella risk assessment to check whether it remains adequate, i.e. there have been no significant changes requiring a new assessment
- An assessment of how well risks are being managed, including compliance with the control scheme and remedial actions required. Where good progress has been made, this may be reflected by the risk rating for the site being revised.

The findings from these checks will be incorporated into the annual monitoring record issued following the contractor's visit.

7.0 Carrying out work on water systems

All maintenance work, additions and modifications to pipework and water systems should be carried out in a way that eliminates or minimises legionella risks, e.g. by specifying Water Regulations Advisory Scheme fittings approved for use on the UK Water Supply System. Where organising your own works, you should make checks with your appointed contractor to ensure this will happen.

7.1 Action when a building is to be unoccupied for a long period

When a building is to be out of use for some time, the risk of legionella growth in any residual water still held within the system is increased e.g. by water stagnating in tanks and pipework. Although aimed at schools, the precautions outlined in this information sheet can also be applied in other settings.

8.0 Training

Premises managers should undertake the NCC provided premises management training (Part 1), which includes instruction on the requirements for managing legionella risks.

Additionally, those tasked with undertaking monitoring and maintenance tasks such as flushing and temperature checks should receive training provided by the appointed legionella contractor on the specific checks required.

9.0 Action in the event of water sample testing positive for Legionella

If a water sample tests positive for Legionella, with TVC (total viable counts) exceeding the HSE action limit (or anything untoward is found during a risk assessment), NPS will co-ordinate the required action in accordance with HSE guidance.

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Where such results are found in a non BMP4 school it is the responsibility of the Headteacher to ensure the appropriate actions are taken.

9.1 Actions in the event of a confirmed case or outbreak of Legionellosis

In the event that:

- The school is notified an individual has been diagnosed with Legionnaire's Disease or;
- An outbreak of the disease (defined as two or more confirmed cases of Legionnella occurring in the same locality within a six month period) is suspected that may be attributable to the water system or;
- Urgent action is required following routine inspections;

The following must happen;

- Where the premises is NCC managed (e.g. a facilities managed premises) or a school in the BMP4 scheme, NPS must be notified as quickly as possible and will take all necessary actions required to control the situation. Otherwise;
- The manager of any NCC premises (whether or not the water systems are managed by NPS) must inform the Health Safety and Wellbeing Team of any individual cases or outbreaks

10. Other information

HSE legionella microsite - http://www.hse.gov.uk/legionnaires/

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