

# ST VINCENT'S CATHOLIC PRIMARY SCHOOL



## LEGIONELLA POLICY

**Policy Date: September 2022**  
**Revised: September 2024**

## **Mission Statement**

### **Caritas Christi Urget Nos**

***The love of Christ urges us to care for each other and strive for excellence in everything we do.***

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

## **1. POLICY STATEMENT**

The 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 employees 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.

## **2. THE LAW**

a. 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is often amended and Regulations introduced, the references made in this Policy may be to legislation that has been superseded.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).

i. Health and Safety at Work Act 1974

ii. Management of Health and Safety at Work Regulations 1999

iii. Care Standards Act 2000

## **3. 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.

## **4. MANAGEMENT**

The Headteacher will ensure that:

i. relevant risk assessments are carried out and that control measures are implemented,

ii. appropriate training is provided,

- iii. flushing and testing of water outlets is carried out in accordance with Appendix 1,
- iv. any problems with water or the water system are reported to Barnet Council,
- v. Disinfection procedures are monitored where necessary – see Appendix 2,
- vi. records are kept for each water outlet for flushing and testing and disinfection procedures,
- vii. a Water Hygiene Risk Assessment Company (WHRAC) is engaged to carry out tasks required so as to be compliant.

This policy document provides an overview of the practical management of water safety management, as detailed in the associated Excel document **St Vincent's water sys inv & templates.xlsx**. This document is maintained by the Premises Manager.

## **5. GENERAL INFORMATION**

- a. 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.
- b. The school stores and distributes hot water above 60°C. Users are protected from scalding by controlling the delivery temperature of hot water from a tap to 43°C by the use of thermostatic mixing valves (TMVs). Checks are required to ensure that the valves are working correctly.
- c. 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 immune-deficiency.
- d. 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.
- e. 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.

## 6. 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 values, are working properly.

Additionally, an annual Risk Assessment is undertaken by the WHRAC, who reports on findings, with an Action Plan to rectify any Non Conformances (NC) found. The Premises Manager records NCs in the School Risk Register and is responsible for managing appropriate actions, in conjunction with the Head Teacher and Office Manager.

## 7. CONTROL MEASURES

To achieve ongoing control of legionella, thorough flushing of the water system is required.

Effective control measures require the school to:

- i. Monitor any water outlets that are not in regular use.
- ii. Record the flushing of all such water outlets
- iii. Record the temperatures of hot and cold water outlets.

Details of flushing and testing regimes that need to be carried out are listed in Appendix 1.

## 8. TESTING ARRANGEMENTS

a. Under certain circumstances, for example when there have been alterations or maintenance work to the water system, testing is to be carried out in accordance with **Appendix 1**.

b. 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 – see **Appendix 2**.

## 9. INFORMATION, INSTRUCTION TRAINING

a. The Headteacher will ensure that suitable and sufficient training and information are provided to the School Premises Manager, the Caretaker and any other member of staff who have responsibilities for flushing, record

keeping and taking temperature readings as required by the appendices. (See Appendix 4 for a Site Summary of Nominated Authorities).

b. Any new measures that are introduced to control legionella will require appropriate training provision.

c. The School Premises Manager will ensure that a record of all instruction and training given to members of staff is recorded in the Legionella Log.

**Monitoring and Evaluation of this policy**

The Curriculum Committee will, in consultation with the Head teacher/Deputy Head teacher monitor and evaluate the implementation of this policy. It will be reviewed at least every 2 years to ensure it reflects current practice.

Member of staff with Lead Responsibility for this policy:	Marie Tuohy and Mike Landers
Date of Policy:	September 2022
Date for Review:	September 2024

## **Appendix 1 to the Control of Legionella Policy**

### **FLUSHING AND TEMPERATURE TESTING PROCEDURES**

#### **1. FLUSHING**

- a. All water outlets (hot & cold) must be flushed through weekly. Where water outlets are routinely used, this acts as the flushing routine and additional flushing is not required.
- b. For outlets not in regular use, a flushing regime must be maintained, whereby the outlet will be flushed on a weekly basis, for five minutes, at full flow rate. A record of this being done, signed by the operative will be displayed adjacent to the outlet.
- c. Flushing will always be required for all water outlets during periods of non-use that exceed four days. That applies specifically to holiday periods when the school is closed. Flushing is required at the end of the period of non-use and within three days of school reopening.
- d. All records of flushing will be filed in the Legionella Log. That is, completed forms displayed by outlets and records of global flushing following periods of non-use.
- e. Full details and template documents for the process for flushing are contained in Excel document **St Vincent's water sys inv & templates.xlsx**

#### **2. TEMPERATURE TESTING CRITERIA**

- a. A single cold and hot tap on the main hot and cold water systems, which is not connected via a thermostatic mixing valve, must be run each month, for one minute (in the case of a hot tap) and two minutes (in the case of a cold tap), so that a temperature can be taken using a thermometer and recorded in the Water Temperature Logbook.
- b. For legionella, outlets are temperature tested internally each month, under direction of the WHRAC, to whom readings are forwarded. The readings are in accordance with a schedule provided by the WHRAC and include the 'Sentinel point' (i.e. first point at mains in pipe) to the furthest.
- c. The cold water outlet temperature should be below 20°C after two minutes running and the hot water outlet temperature should be above 50°C after one minute running,

- d. The Premises Manager maintains and reviews the records any non-conformances, so as to ensure management through to closure.
- e. If the required temperatures cannot be achieved for an installation for three consecutive tests, then the Premises Manager will arrange for the installation taken out of use and for the WHRAC to be contacted for further assistance.
- g. Scientific tests may be required when there appear to be problems with the water supply, such as discolouring or temperature problems. These should be reported to the Headteacher or Office Manager, who will contact the WHRAC to provide appropriate support and action.
- h. If a positive Legionella test is reported there will be a re-test every 3 months, until two consecutive clear readings are established.

## **Appendix 2 to the Control of Legionella Policy**

### **1. PROCEDURE FOR DISINFECTION**

- a. If the school produces a sufficiently high result after testing, and a risk assessment recommends action, it will be disinfected by an approved WHRAC.
- b. The Office Manager or Premises Manager will arrange the time and date of disinfection with the selected contractor.
- c. Affected areas will be withdrawn from use until disinfection has been completed. Flushing of outlets in these areas will cease until disinfection has been completed.
- d. A supply of clean water for the kitchen area will be drawn off from an uncontaminated source and stored in containers on the morning of a disinfection visit.
- e. Once disinfection commences, the water system will not be usable (except in WC's) until the WHRAC declares it to be safe. During disinfection, drinking water must only be drawn from a bottled supply.
- f. Alternative hand cleaning methods will be instigated to supplement the wearing of protective gloves for personal care. (eg. Hibiscrub & antiseptic wipes).
- g. Staff and pupils will be protected from accidental use or drinking of disinfected water by securing the outlets or denying them access.
- h. Disinfected areas will be re-instated immediately after completion of the disinfection process and the flushing regime will recommence.

## Appendix 3 to the Control of Legionella Policy

### PROCEDURE FOR MAINTENANCE OF WATER INSTALLATIONS

The Excel document **St Vincent's water sys in 7 templates.xlsx** documents and maintains:

- a. An inventory of all installations in the school.
- b. Form masters for display at all internal maintenance locations (flushing and descaling).
- c. A record of all internal and external maintenance undertaken and the responsible parties.

Sample views of these documents are shown below.

Type	Room Location	Room No.	Tap Fitting	TMV	Tap Sensor	Maint. Form Applicable
Wash Basin	Accessible Toilet <b>Small Hand Wash Basin</b>	4	Mixertap	1		A
WC	Accessible Toilet <b>WC x 1</b>	4		1		
Wash Basin	Staff Toilet <b>Small Hand Wash Basin</b>	10	Mixertap x 2	1		A
WC	Staff Toilet <b>WC</b>	10		1		
Wash Basin	Staff Toilet <b>Small Hand Wash Basin</b>	11	Mixertap x 2	1		A
WC	Staff Toilet <b>WC</b>	11		1		
Shower	Staff Shower	12	Mixertap to hose & shower head			B,C
Sink	Langdale Kitchen Sink	13	Mixertap			A
Wash Basin	Langdale Toilet <b>Wash Basin x 3</b>	13	Single hot push button tap	2		A
WC	Langdale Toilet <b>WC x 2</b>	13		1		
Wash Basin	Girl's Infant Toilet <b>Wash Basin</b>	15	Single (hot & cold blend) x 3	1	3	A
WC	Girl's Infant Toilet <b>WC Cubicles x 3</b>	15		1		
Sink	Willow Classroom Sink	16	Mixertap	1		A
Sink	Holly Classroom Sink	17	Mixertap	1		A
Sink	Staff Room <b>Enamel Sink with Draining Board</b>	19	Mixertap			A
Sink	Juniper Classroom Sink	19	Mixertap	1		A
Sink	Boy's Infant Toilet <b>Sink with grill</b>	20	Separate hot & cold			A
Wash Basin	Boy's Infant Toilet <b>Wash Basin</b>	20	Single (hot & cold blend) x 3	1	3	A
WC	Boy's Infant Toilet <b>WC Cubicles x 3</b>	20		1		
Sink	Blackthorn Classroom Sink	21	Mixertap	1		A
Sink	Poplar Classroom Sink	22	Mixertap	1		A
Wash Basin	Accessible Toilet <b>Hand Wash Basin</b>	23	Mixer			A
Sink	Accessible Toilet Sink	23	Mixer with hose to shower head			B,C
Sink	Oak Classroom <b>Enamel Sink with Draining Board</b>	24	Mixertap	1		A
Urinal	Boy's Playground Toilet <b>Urinal x 1</b>	26				
Wash Basin	Boy's Playground Toilet <b>Wash Basin</b>	26	Single (hot & cold blend) x 3	1	3	A
WC	Boy's Playground Toilet <b>WC x 1</b>	26		1		
Wash Basin	Girl's Playground Toilet <b>Wash Basin</b>	27	Single (hot & cold blend) x 3	1	3	A
WC	Girl's Playground Toilet <b>WC Cubicles x 2</b>	27		1		
Wash Basin	Adult Playground Toilet <b>Small Hand Wash Basin</b>	28		1		A
WC	Adult Playground Toilet <b>WC x 2</b>	28		1		
Dish Washer	Main kitchen - <b>Dish Washing Machine</b>	31				
Wash Basin	Main kitchen - <b>Hand Wash Basin</b>	31	Separate hot & cold	1		A
Sink	Main kitchen - <b>Sink 1</b>	31	Mixer into single tap spray			A
Sink	Main kitchen - <b>Sink 2</b>	31	Separate hot & cold (drinking)			A
Wash Basin	Main kitchen Toilet - <b>Small hand wash basin</b>	31	Mixer: single lever ball joint	1		A
WC	Main kitchen Toilet - <b>WC x 1</b>	31				
Sink	Silver Birch Classroom Sink	34	Mixertap	1		A
Sink	Rowan Classroom Sink	35	Mixertap	1		A
Wash Basin	Boy's Junior Toilet <b>Wash Basin</b>	36	Single (hot & cold blend) x 3	1	3	A
WC	Boy's Junior Toilet <b>WC Cubicles x 3</b>	36		1		
Sink	Pine Classroom Sink	37	Mixertap	1		A
Sink	Hazel Classroom Sink	40	Mixertap	1		A
Sink	Elm Classroom Sink	41	Mixertap	1		A
Sink	Girl's Junior Toilet Sink	42	Separate hot & cold			A
Wash Basin	Girl's Junior Toilet <b>Wash Basin</b>	42	Single (hot & cold blend) x 3	1	3	A
WC	Girl's Junior Toilet <b>WC Cubicles x 3</b>	42		1		
Sink	Beech Classroom Sink	43	Mixertap	1		A
Wash Basin	First Aid Room <b>Hand Wash Basin</b>	1A	Mixertap	1		A
Drinking Water	Langdale Playground <b>Drinking Water Fountain x 2</b>		Push button Tap			
Drinking Water	Main Playground <b>Drinking Water Fountain x 5</b>		Push button Tap			

TASK			
<b>Sink and tap descaling maintenance.</b>			
HSE GUIDELINE			
Scale provides bacteria with a nutrient (food!) and an ideal surface on which to spread. Outlets should be cleaned, disinfected, and remain scale free.			
PROCESS			
Clean the tap and all the surrounding areas thoroughly so as to remove the build up of limescale, using a suitable approved cleaning product.			
LOCATION			
FREQUENCY			
To be done <b>every 12 weeks</b> in October, January, April and July.			
Date Work Done	Work Done By (write full name)	Signed	Comments
October date			
January date			
April date			
July date			



Installation	Internal Maintenance			Contractor Maintenance		
	Description	Frequency	Responsible	Description	Frequency	Contractor
Sink						
Thermostatic Mixing Valve				Implement annual fail safe tests, full servicing & cleaning on all TMV's, thermostatic mixing taps, filters and strainers. If excessive deposits such as scale are identified within valves / strainers / filters, this procedure may be required more frequently.	Two visits 6 months apart Ian Wedd advises a visit to do fail safe test & one to do a full service.	T&D Barr
Cold Sentinel Outlet Tank Fed / Mains						
Washing Machine						
WC						
Urinal						
Wash Hand Basin						
Wash Hand Basin Tap Outlets (2018-030)	Outlets should be cleaned, disinfected, and remain scale free. <b>Maintenance Form A.</b>					
Shower head (Risk 2018-026)	Remove and descale. <b>Maintenance Form B.</b>	3 monthly	Caretaker			
Shower water system (Risk 2018-027)	Flush the system (hot water) for 5 minutes. <b>Maintenance Form C.</b>	Weekly	Caretaker			
TMShower (Tank Fed / Mains Fed)					Annual	T&D Barr
Pot Wash Sink						
Dish Washing Machine						
Steam Oven	<b>NOT USED</b>					
Drinking Fountain Tap					Annual	T&D Barr
Calorifier drains (Risk 2018-029)				Annual purge from calorifier drains. Collect the initial flush to inspect clarity, quantity of debris & temperature.	Annual	T&D Barr
Thermal insulation on hot & cold water systems (Risk 2018-024)	Check annually to ensure it is intact and consider weatherproofing where components are exposed to the outdoor environment.	Annually	Caretaker			

## APPENDIX 4 SITE SUMMARY

### NOMINATED AUTHORITIES

Site Name: *St. Vincent's RC Primary School, The Ridgeway, Mill Hill, London, NW7 1EJ*

	NAME	POSITION	TEL. NO
STATUTORY SITE DUTY HOLDER	Marie Tuohy	Headteacher	020 8959 3417
DEPUTY NOMINATED RESPONSIBLE PERSON	Shirley Coffey	Office Manager	020 8959 3417
MONITORING PERSON	Michael Landers	Premises Manager	07802 841 256
DEPUTY MONITORING PERSON	Tony Ramos	Caretaker	020 8959 3417
SERVICE PROVIDER			
WATER HYGIENE RISK ASSESSMENT COMPANY	Palm Solutions: James Hawksworth	Contract Account Manager	01284 544 734