1. Haringey Council Policy

1.1 This document sets out the procedure employed by Haringey Council to control the risk of legionella to the lowest practicable level in buildings under its control. This will be achieved by improving the standards of existing water and ventilation systems, implementing safe operational procedures and ensuring that the design and installation of all new systems conform to current standards.

2. Scope of Procedure

2.1 This procedure applies to the control of legionella bacteria, in any undertaking involving a work activity managed by the Council on its behalf. It applies to premises controlled by the Council where water is used or stored; and where there is a means of creating and transmitting water droplets, i.e. aerosols, which may be inhaled, causing a reasonably foreseeable risk of exposure to legionella bacteria.

2.2 The water systems, processes and facilities likely to create a significant risk of Legionellosis, for which this policy is aimed, are:

- Cooling systems with cooling towers, evaporative condensers or dry/wet cooling systems.
- Hot and cold water systems.
- Spa pools.
- Other plant and systems containing water that can create and increase the risk from legionella during operation or when being maintained.

3. Responsibilities for Implementation

3.1 Duty holder

3.1.1 Haringey Council itself is the duty holder and is primarily responsible for ensuring the risk from contamination of water systems is adequately managed for the premises under its control. The Council will ensure that adequate resources are provided for the full and effective operation of this procedure.

3.1.2 It will ensure that effective mechanisms are in place and appoint relevant people to be managerially responsible for the implementation and monitoring of the appropriate control measures.

3.1.3 The employer in a school varies with the type of school, and so will be the duty holder. For local authority managed schools e.g. community schools and voluntary-controlled schools, the employer is the Council. For voluntary-aided and foundation schools, it will be the school governors, and for academy and free schools, the academy trust will be the employer. For independent and fee-paying schools, it may be the proprietor, governors and trustees.

3.2 Property Compliance Board

3.2.1 Monitor and review the development and implementation of the procedure for the control of legionella.

3.2.4 Serve as a forum for the communication of issues faced and the developments made in legionella management and control to ensure a standard and consistent approach in adopted across Haringey Council.

3.2.5 Report to the Corporate Health, Safety and Wellbeing Committee quarterly on compliance monitoring, including legionella control, in Council controlled premises.

3.3 Responsible Persons – All Property Portfolio Managers

3.3.1 Take day-to-day responsibility for managing the control of any identified risks relating to the water systems under their control. The responsible person may delegate this responsibility to someone with competence and knowledge of the installation e.g. caretaker, providing they are competent to do so.

3.3.2 Liaise closely with other professional/contractors as necessary to ensure Haringey Council water systems are safe and in efficient working states.

3.3.3 Ensure that written water risk assessments are in place for all Haringey Council properties under their control.

3.3.4 Ensure that written schemes for controlling any reasonably foreseeable risks in water systems are designed, implemented and managed.

3.3.5 Ensure that routine monitoring/inspection and testing are undertaken.

3.3.6 Keep records of risk assessments, written schemes of control, records of examinations, tests and repairs of control measures etc. for the water systems under their control.

3.3.7 Bring to the attention of the Property Compliance Board of potential areas of risk and identify where systems do not comply with legal requirements.

3.3.8 Inform the Property Compliance Board of necessary measures that are needed to be taken to ensure acceptable water quality.

3.3.9 Prioritise the identified tasks into action plans identifying, initially, cost and service implications and then on to structured and time-tabled progress targets.

3.3.10 Ensure contractors and third parties appointed to provide services are competent, suitably trained and have the necessary equipment to carry out their duties in the written scheme safely and adequately.

3.3.11 Maintain their competence, skills and knowledge about the organisation's water systems to ensure that all operational procedures are carried out in a timely and effective manner and implement the control measures and strategies.

3.3.12 Report any significant risk control shortfalls to all those identified above.

3.3.13 Notify the local authority if a cooling tower or an evaporative condenser is present and in use in the premises, under the Notify Notification of Cooling Towers and Evaporative Condensers Regulations 1992.

3.4 Corporate Health and Safety Team

3.4.1 Develop and implement a procedure for the control of legionella in line with legislative requirements.

3.4.2 Monitor compliance of this procedure through the auditing process.

3.4.3 Provide advice and assistance to the Council, responsible persons and other stakeholders.

3.4.4 Keep this procedure up-to-date in with any future legislative changes.

3.5 Appointed Partner/Specialist Contractor

3.5.1 Haringey Council employs appointed partners/specialist contractors, e.g. Homes for Haringey for residential blocks and Amey for corporate buildings, to carry out periodic inspections and monitoring (including sampling and testing) of Council's water systems. The appointed partners/specialist contractor, in close liaison with the relevant responsible persons will:

3.5.1.1 Administer any control measures required to mitigate the risks of legionella bacteria and will supply Haringey Council with recommendations for any remedial works identified during periodic inspections;

3.5.1.2 Inform the responsible persons of changes to or in the use of any appliances connected to the hot or cold water services;

3.5.1.3 Inform the responsible persons about incorrect temperatures of water issuing from taps, discoloration or unusual smell from the hot or cold water supply;

3.5.1.4 Ensure the sub-contractors they engage to provide services to Haringey Council on their behalf have the appropriate competence, industry certification and are monitored to a suitable standard;

3.5.1.5 Carry out an annual internal audit of their own operations and will provide a report to the responsible person and assurances that they continue to hold and comply with all the requirements of the Legionella Control Association's Recommended Code of Conduct;

3.5.1.6 Familiarise themselves with Haringey Council procedure on control of legionella in water systems to ensure its requirements are met.

4. Specialist Advice

4.1 The Council provide specialist advice by employing competent qualified health and safety practitioners, who are located within the Corporate Health and Safety Team: 02084894520, health.safetyadvice@haringey.gov.uk

5. Other documents you may need to consider

5.1 Legislation and Guidance (hyperlinks)

5.1.1 The Control of Substances Hazardous to Health Regulations 2002
In particular regulations 6, 7 and 12)

5.1.2 The Water Supply (Water Fittings) Regulations 1999

5.1.3 Approved Code of Practice: The Control of Legionella Bacteria in Water Systems (L8)

5.1.4 Notification of Cooling Towers and Evaporative Condensers Regulations (1992); in particular regulation 3. http://www.legislation.gov.uk/uksi/1992/2225/contents/made

5.1.5 Management of Health and Safety at Work Regulations (1999); in particular regulation 5: http://www.legislation.gov.uk/uksi/1999/3242/contents/made

5.1.6 COSHH ACOP L5: http://www.hse.gov.uk/PuBns/priced/l5.pdf

6. Action to Take

6.1 Risk assessments

6.1.1 A suitable and sufficient legionella risk assessment must be carried out for each Council controlled premises to identify and assess the risk of exposure to legionella bacteria from work activities and water systems and any precautionary measures.

6.1.2 For the Council's extensive residential property portfolio, it may be necessary to prioritise water systems that pose the highest risk for assessment. A representative proportion of the residential portfolio will initially be assessed on the basis of similar design, size, age and water supply, with the entire portfolio eventually assessed on a rolling programme of work.

6.1.3 The assessment must take into account the individual nature of each premises. In complex systems, a site survey of all the water systems should be carried out, including an asset register of all associated plant, pumps, strainers and other relevant items. An up-to-date schematic diagram showing the layout of the plant or system, including parts temporarily out of use, should also be included.

6.1.4 The responsible person must ensure that the person who carries out the legionella risk assessment and provides advice on prevention and control of exposure must be competent to do so.

6.1.5 The legionella risk assessment is a live document that must be reviewed to ensure it remains up-to-date. The review should be undertaken regularly and specifically whenever there is reason to suspect it is no longer valid, which may include:

a. Changes to the water system or its use;
b. Changes to the use of the building in which the water system is installed;
c. The availability of new information about risks or control measures;
d. The results of checks indicating that control measures are no longer effective;
e. Changes to key personnel;
f. An outbreak of Legionnaires' disease is associated with the water system. Analysis of water samples will only be carried out by a UKAS accredited laboratory.

6.1.6 Where the risk assessment demonstrates that there is no reasonably foreseeable risk or that risks are insignificant and unlikely to increase, no further assessment or measures are necessary.

6.1.7 The legionella risk assessments need reviewing regularly. The reviewing periodicity will depend on the complexity of the water system and its condition. The competent person carrying out the water risk assessment should advice on the proposed date for the review. If no date is proposed then they are to be reviewed every 2 years.

6.2 Written Scheme of Control

6.2.1 Where the risk assessment of a water system shows that there is a reasonably foreseeable risk of exposure to legionella bacteria, a written control scheme for preventing or controlling the risk from exposure will be prepared, implemented and managed. This scheme will be specific and tailored to the system covered by the risk assessment.

6.2.2 The written scheme will specify measures to take to ensure that it remains effective and will, among other things, include:

a. Schematic plan of the water system showing its layout and all its components;
b. Description of the correct operations of the system plant;
c. Physical and chemical treatment programme including temperature checks, analytical tests, inspections, their frequency and any resulting corrective actions;
d. System control parameters and precautions in place to prevent or minimise risk associated with the system.
e. Remedial measures to be taken when control limits are exceeded, including control scheme reviews and any modification made;
f. Health and safety information, including details of storage, handling, use and disposal of any chemical used in both treatment of the system and testing of the system water;
g. Cleaning and disinfection procedures;
h. Emergency procedures for system failures, unacceptable temperature readings, legionella detection and outbreak of Legionnaires' disease.

6.3 Information, Instruction and Training

6.3.1 The Haringey Council staff appointed or assigned with responsibilities under this procedure will receive the necessary training appropriate to their roles and responsibilities. Refresher training and instruction will be provided to maintain awareness of changing technological developments and contemporary best practice every two years.

6.3.2 All employees involved in work that may expose an employee or other person to legionella will be given suitable and sufficient information, instruction and training. This includes information, instruction and training on the significant findings of the risk assessment and the appropriate precautions and actions they need to take to safeguard themselves and others.

6.4 Monitoring and Routine Inspection of Water System

6.4.1 The responsible person will monitor the condition and performance of the water system for each premises under their management. Where appropriate, an external contractor or an independent third party may be appointed to do it.

6.4.2 The monitoring and routine inspection should include:

a) Checking the performance and operation of the system and its component parts;
b) Inspecting the accessible parts of the system for damage and signs of contamination
c) Monitoring to ensure that the treatment regime continues to control to the required standards.

6.4.3 Monitoring of hot and cold water systems will be done in accordance with the written scheme on the legionella risk assessment, but as a minimum, those listed in section 7.

6.4.4 The monitoring escalation in Appendix 1 will be followed when readings outside set standards are encountered.

6.5 Record Keeping

6.5.1 Records of risk assessments, written schemes of control, records of examinations, tests and repairs of control measures should be retained throughout the period they are current and for at least two years afterwards. Records of any monitoring inspection, test or check carried out, and the dates, must be retained for at least five years.

6.6 Actions in the event of a confirmed outbreak

6.61 The actions contained in Appendix 2 should be followed in the event of a confirmed outbreak.

7. Local Water Hygiene Checks

7.1 Unless the written scheme applicable to one system is more onerous, the following checks will be carried out as a minimum in all water systems:

- Temperature control valves maintained on an annual basis by competent person.
- Water softeners and filters maintained according to manufacturer's instructions.
- Calorifier temperatures kept above 60°C.
- Weekly flushing unused outlets for at least one minute.
- Monthly testing of sentinel taps from every calorifier (e.g. boiler) and water storage facility (e.g. tank), and one extra tap, different each month if possible, so the whole system is tested throughout the year. Normally the testing is carried out using a digital thermometer with a probe.
    - Cold water must be <20°C after 2 minutes running.
    - Hot water must be >50°C after 1 minute running, except for healthcare premises which must be >55°C. In the case of taps fitted with TMVs, an

alternative method shall be used to test the hot water temperature e.g. by testing the hot water pipe temperature using a clip-on or laser thermometer.

- De-scale shower heads quarterly.

These checks must be recorded using the templates facilitated in the water risk assessment. If no templates are available, appendix 3 form should be used.

8. Monitoring and Review

8.1 The implementation of this procedure and performance against the standards stated therein will be monitored by the Property Compliance Board through the monthly compliance reporting by responsible persons.

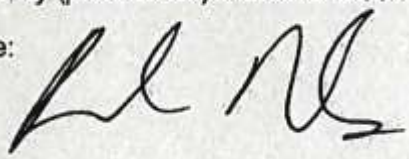
8.2 This procedure will be reviewed every year from the date of approval by the Corporate Health, Safety and Wellbeing Board, to ensure its continuing suitability, adequacy and effectiveness or a required by the introduction of new legislation that impacts on Haringey Council legionella management obligations, changes to Haringey business practices or in light of health and safety management system audits.

9. Approval of the Procedure

9.1 This procedure was reviewed and approved by the Council's Head of Organisational Resilience on 17th October 2018.

9.2 Any required variations from this safety procedure should be brought to the attention of the Council's Head of Organisational Resilience.

Approved by (print name): Andrew Meek

Signature: 

Date: 17th October, 2018

10. Explanatory Notes

10.1 Some uncommon abbreviations used in this procedure are:

10.1.1 TMV: Thermostatic Mixer Valve: An automatic temperature controlling device which can be fitted to water tap systems so hot water does not surpass 43ºC.

10.1.2 CFU: Colony Forming Units: Is a **unit** used to estimate the number of viable bacteria or fungal cells in a sample.

10.1.3 Sentinel taps: are those taps which are closest and furthest to a cold water storage facility e.g. water tank or a hot water storage facility e.g. a boiler. The system schematic in the water risk assessment will aid the responsible person to locate such taps.

Appendix 1: Monitoring Escalation

1 Actions on detecting temperatures outside set parameters

- The Responsible Person must be informed immediately;
- An engineer should attend as an emergency job to ascertain the problem and carry out remedial works;
- After completion of remedial works, temperature should be re-taken and recorded in log book.

2 Actions in the event of legionella detection

Where sampling indicates legionella bacteria count greater than 100cfu/ml but less than 1000cfu/ml in hot and cold water service, the following actions will be carried out:

I. If only one or two samples are positive, the system should be re-sampled. If a similar count is found again, a review of the control measures and risk assessment should be carried out to identify any remedial actions;

II. If the majority of samples are positive, the system may be colonised, albeit at a low level, with Legionella. Disinfection of the system should be considered but an immediate review of control measures and a risk assessment should be carried out to identify any other remedial action required.

3 Where sampling indicates a count of 1000cfu/ml or higher:

- The system should be re-sampled and an immediate review of the control measures and risk assessment carried out to identify any remedial actions, including possible disinfection of the system.

Appendix 2: Actions in the event of a confirmed outbreak

An outbreak is defined by the Public Health Laboratory Service (PHLS) as two or more confirmed cases of Legionnaires' disease occurring in the same locality within a six-month period. Location is defined in terms of the geographical proximity of the cases and requires a degree of judgement. It is the responsibility of the Proper Officer for the declaration of an outbreak. The Proper Officer is appointed by the local authority under public health legislation and is usually a consultant in communicable disease control.

Whoever receives an enquiry or notification regarding an outbreak of Legionnaires' disease alleged to be connected with Haringey Council premises or plant must immediately notify the Deputy Head of Service – Health and Safety, who will notify the relevant responsible persons and the Proper Officer.

The Council will have established incident plans to investigate major outbreaks of infectious disease including Legionnaires' disease. These are activated by the Proper Officer who invokes an outbreak committee, whose primary purpose is to protect public health and prevent further infection. This will normally be set up to manage the incident and will involve representatives of all agencies involved. HSE or the local authority EHO may be involved in the investigation of outbreaks, their aim being to pursue compliance with health and safety legislation.

The Council' Consultant in Communicable Disease Control (CCDC) or Environmental Health Officer (EHO) acting on behalf (often with the relevant officer from enforcing authorities either HSE or local authority) may make a site visit to the relevant Haringey Council premises.

As part of an outbreak investigation and control, the HSE will liaise with Haringey Council to:

- Seek to identify the source;
- Identify those people likely to be affected;
- Shut down any process which is capable of generating and disseminating airborne water droplets and ensure it is treated as soon as possible;
- Keep the system shut down until sampling procedures and any remedial cleaning or other work have been undertaken and the system is safe to return to normal use;
- Agree any additional control measures that need to be implemented.

Appendix 3: Hygiene Log Book (these forms will be available for downloading)

Please print, photocopy extra sheets, as required.

Outlets

Monthly Temperature Monitoring

Company Name:		**Site Name:**	
Manager/Supervisor:		**Site Reference:**	
Signature:		***Action required if:*** *Cold Water temperature is greater than 20°C & not is less than 50°C. Hot water safety sign should be installed by any hot outlet outputting at 45°C, or greater.* ***Please also complete corrective measures record sheet if required.***	

RECORD COLD WATER TEMPERATURE WITHIN 2 MINIUTES OF RUNNING OUTLET.

RECORD HOT WATER TEMPERATURE WITHIN 1 MINIUTES OF RUNNING OUTLET.

Outlet Location		Jan		Feb		Mar		Apr		May		Jun		Jul		Aug		Sep		Oct		Nov		Dec	
		Date:		Date:		Date:		Date:		Date:		Date:		Date:		Date:		Date:		Date:		Date:		Date:	
		J.No.																							
Floor	**Room**	H	C	H	C	H	C	H	C	H	C	H	C	H	C	H	C	H	C	H	C	H	C	H	C
Initials:																									

EXAMPLE

Haringey LONDON

Please print, photocopy extra

System Deadlegs & Flushing

Weekly Flushing Record Sheet

Company Name:		**Site Name:**	
Engineer:			
Signature:		**Site Reference:**	

Outlet Location	Week	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52
	Month	January					February				March				April				May					June				July					August				September				October					November				December			
	Date																																																				
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52
		January					February				March				April				May					June				July					August				September				October					November				December			

Schedule of Monitoring and Cleaning

Please print, photocopy extra sheets, as required.

Annual Planner - 2017	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52
	January					February				March				April				May					June				July					August				September				October					November				December			
Cooling Towers	*Not Applicable*																																																					
Legionella screenings																																																					
Clean & chlorination																																																					
Analytical visits																																																				
Supply of chemicals																																																				
Dipslide tests																																																				
Domestic Cold Water																																																				
Tank Inspection																																																				
Disinfection of Tanks & Outlets																																																				
Temperature Monitoriing Of Taps																																																				
Domestic Hot Water																																																				
Calorifier Inspection																																																				
Temperature Monitoring of Calorifiers																																																				
Chlorination of calorifier/outlets																																																				
Temperature Monitoring of Taps																																																				
Infrequently used Outlets																																																				
Weekley Flushing																																																				
Showers																																																				
Quarterly Inspection & Descale																																																			
Water Sampling																																																				
TVC Sampling																																																				
Legionella Sampling																																																				
Annual Planner	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52
	January					February				March				April				May					June				July					August				September				October					November				December			

Please print, photocopy extra sheets, as required.

Showers

Corrective Measures Record Sheet

Company Name:	**Site Name:**
Engineer:	
Signature:	**Site Reference:**

Date Problem Identified	Number of Showers	Shower(s) Location	Description of Problem & Works Required	Works Completion Date	Name & Signature *(preferably od responsible person/deputy, or alternatively the*

Additional Comments:

Site Visitors Log Sheet

Date	Visitors Name	Company Name	Purpose of Visit	Time In	Time Out