



LEGIONELLOSIS POLICY

Policy Owners:	Director of Estates and Campus Services; Head of Technical Compliance
Executive Sponsor:	Chief Operating Officer
Accountable Committee/ Sub-committee:	Health, Safety and Welfare Committee
Legal review required:	No
Review due date:	May 2025
Update history:	Approved by Council: 13 July 2020 Approved by Health, Safety & Welfare Committee 6 May 2020; 1 May 2024 (minor revisions)

UNIVERSITY OF ROEHAMPTON
LEGIONELLOSIS POLICY

- 1 Introduction
- 2 Background
- 3 Management Responsibilities
- 4 Safe Operation
- 5 Control Programme & Auditing
- 6 Precautionary & Emergency Procedures
- 7 Communication and Reporting

1. Introduction

University of Roehampton is committed to implement, throughout properties in the municipal estates portfolio, all relevant precautionary measures required to maintain hot and cold-water services in a safe manner which minimises the risks to health associated with the proliferation of Legionella bacteria.

In order to achieve this, the following policy statement and supporting procedures, protocols and guidance have been developed to enable all managers and staff to comply with the best available practices and guidance for the prevention and control of legionellosis in our properties.

1.1. Legionella Policy Statement

The University of Roehampton is committed to the prevention and control of the risk of legionellosis from all work activities and water systems on its municipal estates premises, and in so doing complying with our duties under both the Health and Safety at Work etc. Act 1974 and the Control of Substances Hazardous to Health Regulations 2002 (COSHH).

The University of Roehampton, in line with the Health and Executive Approved Code of Practice L8, will identify and assess potential sources of Legionella bacteria, determine the correct operation of water systems and will ensure that necessary maintenance/monitoring is being carried out by competent personnel. For this all relevant procedures and records relating to the programme will be kept and will be maintained and reviewed as necessary. Appropriate training will be provided for all those with designated responsibilities for the implementation of the University's policy and associated arrangements.

The University of Roehampton will ensure that manufacturers/suppliers of plant and water systems to all their sites will design them in such a way as to not contribute to risk of legionellosis. Necessary information, testing and training will be provided by the manufacturers/suppliers.

Water treatment services or consultancies engaged by the University to assist in implementing the precautionary regime will be competent and members of the Legionella Control Association.

1.2. Review of policy

This policy and associated procedures will be reviewed by the Duty Holder after a period of two years or following a change in legislation/best practice, or following any significant incident.

2. Background

The Legionella Policy should be read in conjunction with the Legionella Management Plan and the University's Health & Safety Policy.

This document deals specifically with all hot and cold-water services within the University of Roehampton municipal estate. However, it should be remembered that humidifiers, air washers, spa baths and pools all present a potential risk as does any water system that operates at temperatures in excess of 20°C and can create an aerosol.

Hot and cold-water systems have the potential to deliver water in a droplet or aerosol form and at an ideal temperature that may allow for the proliferation of legionella bacteria. Other systems such as evaporative condensers and cooling towers must have their own risk assessment, scheme of precautions, management and control procedures. Closed loop systems such as Low Pressure Hot Water (LPHW) heating and chilled water systems do not generate aerosols under normal operation and therefore present a lower risk of causing exposure to legionella bacteria.

The HSE Guide & ACoP L8 known as “Legionnaires’ disease – The control of Legionella bacteria in water systems” details the steps that should be taken to ensure the safe management and use of water systems. At all times employees and contractors working on the water systems are obliged to conform to the Health & Safety at Work etc. Act 1974 and they should ensure that they are using the latest guidance provided by the Health Safety Executive (HSE) in relation to legionella control and management.

2.1. Legionella Bacteria and Legionnaires’ Disease

There are approximately 250 cases of Legionnaires’ disease reported each year. Legionnaires’ disease is not a notifiable disease in England and Wales and reporting is voluntary. It is probable that some cases of Legionnaires’ disease are not detected or reported.

Legionnaires’ disease is a pneumonia caused by legionella bacteria commonly found in hot and cold-water services but also in other systems such as cooling towers, air-conditioning units and showers. The incubation period of the disease is two to ten days and symptoms include myalgia, headache, diarrhoea and eventually pneumonia. The mortality rate can be high, particularly in susceptible individuals (e.g. the elderly, smokers, people with a history of bronchial disease and patients on immunosuppressive drugs). Approximately 25 people die as a result of Legionellosis annually.

3. Management Responsibilities

Under the Control of Substances Hazardous to Health 2002 – Regulations 8 and 12, Health and Safety at Work etc. Act 1974 – Sections 2, 3 and 4 and the Management of Health and Safety at Work Regulations 1999 – Regulation 5 and ACOP L8 the Duty Holder (the person who holds overall responsibility) should appoint a person to take managerial responsibility and provide supervision of the implementation of the scheme of precautions.

THE DUTYHOLDERS	
ORGANISATION / DEPARTMENT / PERSONNEL	SPECIFIC RESPONSIBILITY
<p>Duty Holder Vice-Chancellor</p> <p>Alternative Chief Operating Officer</p>	<p>The Duty Holder and their alternative are responsible for the overall implementation of this policy and shall ensure that appropriate resources and systems are in place and senior managers and other staff adequately discharge their duties in accordance with this policy.</p>
<p>Responsible Person Chief Information Officer</p>	<p>Responsible for ensuring the objectives outlined within the Legionella Policy and Management Plan are understood and acted upon at all levels within the organisation.</p> <p>Ensure that planning, budgets and resources are available in order to enable strategic and operational objectives to be accomplished, as far as reasonably practicable.</p>
<p>Responsible Person Director of Estates</p> <p>Advisory Health and Safety Office.</p>	<p>Responsible for ensuring the objectives outlined within the Legionella Policy and Management Plan are understood, communicated and acted upon by persons under their control.</p> <p>Overall responsibility for the management of risks associated with Legionella, through the:</p> <ol style="list-style-type: none"> 1. Allocation of adequate resources 2. Division of roles and responsibilities 3. Development, implementation, and review of the Management Plan

<p>Nominated Person Head of Technical Compliance</p> <p>Deputy Nominated Person Health and Safety Advisor</p>	<p>Implementation of the Legionella Management Plan including the:</p> <ol style="list-style-type: none"> 1. Distribution of information 2. Coordination of training 3. Instigation of management procedures 4. Maintenance procedures 5. Contractor control 6. Permits to work 7. Inspections, testing and sampling 8. Liaison between management and employees 9. Recording of incidents or complaints which may affect the Legionella Policy Statement or Management Plan 10. Reporting under RIDDOR regulations 11. Liaison with Occupation Health and HR in the event of an exposure 12. Review of Legionella Policy and Management Plan
<p>Site Operative Contracted Personnel</p>	<p>To ensure the following are carried out in line with the Legionella Manual</p> <ol style="list-style-type: none"> 1. Planned preventative maintenance 2. Sampling 3. Testing 4. Monitoring 5. Reporting 6. Minor Remedial Works

4. Safe Operation

The safe operation of buildings managed by the University of Roehampton is based upon the building risk assessments. These risk assessments take into account a number of factors including the building use, population using the building and physical design of the water services. The building category; High, Medium or Low is used to prioritise risk assessment surveys and other relevant actions. The site risk assessment and survey is filed on site and copied to the relevant parties. Details of who has received these documents are held centrally and along with training details.

The University follows a monitoring and sampling programme, which is generally recognized as acceptable and should ensure the safe operation of hot and cold-water systems in line with HSE Guidance & ACoP L8. The HSE Guide & ACoP L8 details the scope, extent & methods associated with the management, control, monitoring and coordination of water systems to minimize the risk of exposure to Legionella bacteria to comply with the COSHH regulations and ultimately, the Health & Safety at Work Act 1974. Further information on the frequency and extent of the inspection

regime can be found in the Legionella Operating Manual available from the Technical and Compliance Manager, Estates and Campus Services.

5. Control Programme and Auditing

All hot and cold-water services should be operated and maintained carefully. Where uncertainty exists, advice must be taken and this is best achieved by contacting the Technical and Compliance Manager, who will be able to provide the advice necessary or contact the relevant specialist.

The programme of treatment, monitoring and cleaning for each system at University of Roehampton can be found in the Legionella Management Plan.

6. Precautionary & Emergency Procedures

The Head of Technical Compliance will be notified if an issue is identified, and a course of action is agreed dependant on severity of the issue noted. The Head of Technical Compliance is supported in these decisions by the contracted Legionella Consultants and the Legionella Control Team (as identified in Section 3. Responsibilities). Further information on emergency procedures is available in the Legionella Management Plan.

7. Communication and Reporting

All relevant members Estates and Campus Services must be aware of the lines of communication in relation to legionella control. Site information is held centrally on the ZetaSafe.net web site (www.zetasafe.net). All results, certificates and reports can be reviewed here.

The Legionella Control Team (LCT), as identified in Section 3, responsibilities are those personnel whose collective responsibilities bring about the management and control of legionella bacteria in line with this policy. The LCT is Roehampton University's own team of nominated personnel and all have an obligation under the scheme of precautions to manage, maintain, monitor, control & operate the hot & cold-water systems in accordance with the requirements of the HSE Guide & ACoP L8.