Legionella Control Policy

1.Introduction

Home from Home Nursery will undertake to ensure compliance with the relevant legislation with regard to the Control of Legionella in hot and cold-water systems for all children 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. Home from Home works with a specialist water treatment and engineering company to manage the control of Legionella.

This policy should be read in conjunction with the COSHH policy & Health and Safety Policy.

2. Contents

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3. The Law

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is often amended and Regulations introduced, the references made in this Policy may be to legislation that has been superseded.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 nurseries, please refer to the Department for Education website at www.education.gov.uk/schools and the Health and Safety Executive website www.hse.gov.uk.

Health and Safety at Work Act 1974.

Management of Health and Safety at Work Regulations 1999.

4. 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.

5. Roles and responsibilities

Responsibility title and name	**Contact details**
Statutory site Duty Holder: Nicola Law (Owner)	01903 248115 nursery@worthingnurseryschool.co.uk
Nominated Responsible Person: Sophie Eade (Manager)	01903 248115 // 07702010068 nursery@worthingnurseryschool.co.uk
Deputy Responsible Person: Sonia Green (Manager)	01903 248115 nursery@worthingnurseryschool.co.uk
Service providers: Plumber – Tim Pettet Plumbing DSW – Specialist water treatment and Engineering Limited – Sam Casey	07772733032 tkpettet@yahoo.co.uk s.casey@dswlimited.co.uk
Service provider head office: West Sussex County Council Worthing Borough Council	01243 777100 Town Hall, Chapel Road, Worthing, BN11 1HA 01903 239999
Nearest Medical Facility/Hospital with A&E: Worthing Hospital	Lyndhurst Road, Worthing, BN11 2DH
Water Supply Company: Southern Water	0330 303 0368 Southern House, Yeoman Road, Worthing, BN13 3NX

6. General Information

What is legionella?

Legionella bacteria is commonly found in water. The bacteria multiply where temperatures are between 20-45°C and nutrients are available. The bacteria are dormant below 20°C and do not survive above 60°C.

Legionnaires' disease is a potentially fatal type of pneumonia, contracted by inhaling airborne water droplets containing viable Legionella bacteria. Such droplets can be created, for example, by: hot and cold water outlets; atomisers; wet air conditioning plant; and whirlpool or hydrotherapy baths.

Anyone can develop Legionnaires' disease, but the elderly, smokers, alcoholics and those with cancer, diabetes or chronic respiratory or kidney disease are at more risk.

HSE's Legionnaires' disease page provides information on managing the risks.

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.

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.

7. Risk Assessment

Assessment of risk is mostly confined to:

- Monitoring whether control measures are being carried out.
- Correct water temperatures are being maintained.
- Engineering measures, such as temperature control valves, are working properly.
- The nursery has no showers on the premises, and water is used only for hand washing and dish washing. There should therefore be no exposure under normal circumstances to water droplets in spray.
- Children are protected from scalding by controlling the delivery temperature of hot water from a tap to approx. 43°C by the use of thermostatic mixing valves.
- All taps are regularly descaled during cleaning of the nursery.

We work with DSW – a specialist water treatment and Engineering company that has undertaken a thorough risk assessment from this we have actions & responsibilities allocated to each person as above in Section 5.

8. Control Measures

Legionella bacteria may contaminate water systems where the temperature is between 20°C and 45°C. It is uncommon to find any significant growth below 20°C, the bacteria does not survive for any lengthy period above 60°C. The optimum temperature growth is 37°C.
The presence of sediment, sludge, scale and organic material can act as a source of nutrients for Legionella bacteria. Commonly encountered organisms in water systems such as algae, amoebae and other bacteria may serve as a nutrient source for Legionella. The formation of a biofilm (slime) within a water system will also play an important role in harbouring and providing favourable conditions in which Legionella can proliferate.

The presence of water stagnation can also play a significant part in legionella growth. An example of this would be a building that has little to no use of its water systems within a school holiday or any disused pipework that is still live.
If the conditions mentioned above are eliminated or controlled, the likelihood of legionella growth will be significantly reduced.

Home from Home will prevent or minimise risks by using measures which do not allow the growth of legionella bacteria in the system and which reduce exposure to water droplets and aerosols. In practice this will be achieved by:

- Avoiding water temperatures between 20 °C and 45 °C and conditions that favour the growth of legionella bacteria and other microorganisms
- Avoiding water stagnation which may encourage the growth of biofilm E.g., by weekly flushing of infrequently used outlets
- Avoiding the use of materials that harbour bacteria and other microorganisms, or provide nutrients for microbial growth. E.g., by only using water fittings and components that comply with the Water Regulations Advisory Scheme (WRAS)
- Controlling the release of water spray
- Maintaining the cleanliness of the system and water in it
- Using water treatment techniques (if identified by risk assessment)
- Taking action to ensure the correct and safe operation and maintenance of the water system. E.g., by routine monitoring and inspection.

9. Testing arrangements

Home from Home has a Legionella management Folder that is kept in the main office, in this folder there is a checklist for hot and cold water systems with an indication of the frequency of inspection and monitoring.

Home from Home will undertake monthly water monitoring in accordance with this checklist, unless the risk assessment indicates otherwise.

<u>Weekly flushing of infrequently used water outlets procedures</u>

- Identify little used outlet(s) (See risk assessment)
- Open outlet whilst minimising the release of water aerosol (reduce spray)
- Flush the outlet until the temperature at the outlet stabilizes and is comparable with the supply water
- Toilets should also be flushed by flushing through one cycle

<u>Monthly water temperature checks at outlets</u>

Outlets without TMV's:

- Identify outlet to be checked by following the customised form in Home from Homes legionella folder for the correct month
- Run the hot tap on full flow for 1 minute and cold tap for 2 minutes
- Place temperature probe under outlet and record reading

- Report any defects/anomaly

Outlets with TMV's fitted

- Identify outlet to be checked by following the customised form in Home from Home's legionella folder for the correct month
- Run hot tap on full flow for 1 minute and cold tap for 2minutes
- Place surface probe attachment against hot inlet pipe to the TMV ensuring a good contact and record reading. (Cold water temperatures cannot be taken with surface probe attachment and must be taken as before)
- Report any defects

10. Microbiological testing

- Microbiological monitoring of domestic hot and cold water supplied from the mains is not usually required, unless the risk assessment or monitoring indicates there is a problem.
- DSW will undertake 6 monthly microbiological testing in each building.

11.Record Keeping

The following records shall be kept on file for a period of 5 years in the legionella folder held in the main office. Electronic records can also be kept.

- Weekly flushing of infrequently used outlets records
- Monthly hot & cold water temperature checks, including flow and return temperatures
- Any quarterly, biannual or annual checks and tests carried out by in house staff or the approved contractor
- Work sheets (with dates) of any work carried out to prevent or control

12.Action in the event of an incident

In England and Wales, legionnaires' disease is notifiable under the health Protection (Notification) Regulations 2010 and in Scotland under the Public Health (Notification of Infectious Diseases) (Scotland) Regulations 1988.
Under these Regulations, human diagnostic laboratories must notify Public Health England (PHE), Public Health Wales (PHW) or Health Protection Scotland (HPS) (see 'Further sources of advice') of microbiologically confirmed cases of legionnaires' disease.

An outbreak is defined as two or more cases where the onset of illness is closely linked in time (weeks rather than months) and where there is epidemiological evidence of a common source of infection, with or without microbiological evidence. An incident/outbreak control team should always be convened to investigate outbreaks. It is the responsibility of the Proper Officer to declare an outbreak. The Proper Officer, appointed by the Local Authority, is usually a consultant in Communicable Diseases Control (CCDC) in England and Wales, or the Consultant in Public Health Medicine (CPHM) in Scotland. If there are suspected cases of the disease, medical practitioners must notify the Proper Officer in the relevant local authority.

Local Authorities will have jointly established incident plans to investigate major outbreaks of infectious diseases, including legionellosis, and it is the Proper Officer who activates these and invokes an Outbreak Committee, whose primary purpose is to protect public health and prevent further infection.

HSE or local Environmental Health Officers may be involved in the investigation of outbreaks, their aim being to pursue compliance with health and safety legislation. The local authority, Proper Officer or EHO acting on their behalf will make a visit for public health reasons, often with the relevant officer from the enforcing authorities (i.e., HSE or the local authority) for health and safety reasons. Any infringements of relevant legislation may be subject to a formal investigation by the appropriate enforcing authority.

There are published guidelines (by PHE, PHW and HPS) for the investigation and management of incidents, clusters, and outbreaks of legionnaires' disease in the community.

These are, for England and Wales, Guidance on the Control and Prevention of Legionnaires' Disease in England and for Scotland, Guidelines on Management of Legionella Incidents, Outbreaks and Clusters in the Community

If a water system is implicated in an outbreak of legionnaires' disease, emergency treatment of that system should be carried out as soon as possible.

13. Review

This policy will be reviewed annually and also in line with any changes in statutory guidance.

14.Version Control

Version	Date	Status	Comments	By
1	April 2025	1st Draft		Sophie Eade
2	July 2025 - finalised	2nd Draft		Sophie Eade
3	May 2026	Reviewed		Sophie Eade