

## **WATER SAFETY MANAGEMENT (Legionella) POLICY**

<b>Date</b>	<b>Purpose of Issue / Description of Change</b>	<b>Equality Impact Assessment Completed</b>
2003	Initial Issue	
27 <sup>th</sup> February 2020	Reviewed and approved by the Health, Safety and Emergency Management Task Group	Jan 2020

<b>Policy Officer</b>	<b>Senior Responsible Officer</b>	<b>Approved By</b>	<b>Date</b>
Head of Health and Safety	University Secretary	Health & Safety Committee	2003

This Policy will be reviewed in 2023

## **1. INTRODUCTION AND PURPOSE**

The Policy has two primary purposes, to confirm arrangements for the control of legionella and establishing requirements for the provision of drinking water.

Legionnaires' disease is a potentially fatal form of pneumonia. The disease is caused by the bacterium *Legionella pneumophila* (and related bacteria) and can affect anybody, although principally those who are susceptible because of age, illness, immune-suppression, smoking, etc. Initial symptoms of the disease include high fever, chills, head and muscle pain. On average there are 200 – 250 reported cases of Legionnaires' disease each year in the United Kingdom, with approximately 12% of these cases being fatal.

The legionella bacteria thrives at temperatures between 20-45°C and when conditions are right; for example, if a supply of nutrients such as rust, sludge, scale, algae and other bacteria are present.

Although the bacteria is common in the environment, the illness is normally contracted by inhaling contaminated water in the form of tiny droplets (aerosols) or in contaminated droplet nuclei (the particles left after the water has evaporated) which are very light and can remain airborne for some time. Person to person spread of the disease has not been documented.

The provision of drinking water in the workplace is also a basic requirement of legislation and a rudimentary expectation of students and staff, supporting personal well-being and resource sustainability through reducing the need for bottled water.

## **2. POLICY STATEMENT**

It is the policy of Bangor University, so far as is reasonably practicable, but in accordance with the relevant statutory requirements and good practice, to ensure the health and safety of staff, students and visitors to the University.

This Policy states the requirements placed on the University and its Colleges and Professional Services with regards to the management of water and air conditioning systems to prevent exposure to Legionnaires' disease.

The Policy also confirms requirement for providing drinking water within occupied buildings.

### **The Policy applies to:**

- All water supplies within University buildings and all equipment that is connected to the water supply and which may pose a legionella risk.
- Any equipment or system with its own independent water reservoir and which may pose a legionella risk.
- The University and all its Colleges and Professional Services that operate or manage equipment / systems that may pose a legionella risk.
- The Management Centre (NWWMDC).
- Staff, students, visitors and contractors.

### **The Policy does not apply to:**

- Sea water systems.

## **3. RELATED POLICIES AND LEGISLATION**

In addition to those general duties in law, the University and its constituent Colleges and Professional Services have a specific obligation under the Control of Substances Hazardous to Health Regulations (COSHH) to assess and manage the risk of exposure to substances (including bacteria) that can harm human health. COSHH places the following primary duties on the University:

- Undertake a suitable and sufficient assessment of the risk of exposure to hazardous substances, including biological agents such as legionella.
- Prevention of exposure, or if this is not possible substitution of a process or method with a less hazardous one, through implementing a hierarchy of risk control.
- Maintain, examine and test control measures.
- Provide information, instruction and training.

The control and management of risks associated with the *Legionella pneumophila* bacteria are further governed by the Health and Safety Executive's Approved Code of Practice, L8: The Control of Legionella Bacteria in Water Systems. This document details specific arrangements that all employers and those with responsibilities for the control of premises should follow to prevent and / or control the risk of exposure to the legionella bacteria.

The provision of wholesome drinking water, which falls under the auspice of the Workplace (Health, Safety and Welfare) Regulations, is also included in this document, with a minimum performance standards specified.

#### **4. DEFINITIONS / TERMINOLOGY**

**Duty Holder:** The University is the legal Duty Holder, with the exception of the Management Centre where the Board of Directors of the North Wales Management and Development Centre is the Duty Holder.

**Competent Person:** The University's appointed 'Responsible Person' as defined in L8. May be a single individual or a number of individuals with particular areas of responsibility and expertise, including specialist contractors or consultants.

#### **5. DUTIES OF THE UNIVERSITY**

As the primary Duty Holder, the University will:

- a. Ensure a suitable management system is in place to control the risk from legionella, in compliance with legislation and the Approved Code of Practice (ACOP)<sup>1</sup> L8: The Control of Legionella Bacteria in Water Systems.
- b. Provide readily accessible drinking water for staff and students.

#### **6. DUTIES OF PROPERTY AND CAMPUS SERVICES (PACS)**

Property & Campus Services is responsible for the general estate and all water supply infrastructure (i.e. fixed pipe work and other permanent components of the water system) within University owned buildings, including halls of residences. As such, PACS will:

- a. Appoint a Competent Person with sufficient authority, competence, skills and knowledge to take day-to-day responsibility for controlling any identified risks from legionella.
- b. Ensure contractors and staff appointed to design, maintain or manage water systems are competent to do so and are provided with relevant information.
- c. Ensure all water systems and relevant air conditioning systems are identified, recorded and suitably risk assessed.

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<sup>1</sup> Produced under the Control of Substances Hazardous to Health Regulations (COSHH)

- d. Ensure any protocols required by a risk assessment and/or the Competent Person are implemented.
- e. Ensure those landlords which the University use have in place suitable and sufficient management arrangements for legionella control, or, where applicable, University arrangements are in place to ensure risk is managed.
- f. Share the findings of the risk assessments with occupying Colleges and Professional Services, as appropriate to the risk.
- g. Ensure adequate supplies of wholesome drinking water within each occupied building, with these labelled accordingly.

PACS will also, through the Competent Person<sup>2</sup>:

- h. Identify potential legionella sources and prepare and / or arrange for Legionella Risk Assessments / Written Schemes (or course of action) to prevent or control risk.
- i. Establish management arrangements as detailed in the Legionella Risk Assessment and / or Written Scheme.
- j. Confirm legionella management arrangements are appropriate for water systems in buildings leased by the University.
- k. Maintain records as required by the Legionella Risk Assessment and / or Written Scheme and any other inspections, maintenance associated with a water system.
- l. Provide relevant information, instruction and training (including refresher) to those with specific responsibilities e.g. maintenance staff.
- m. Ensure appropriate drawings / schematics of water systems are maintained.
- n. Pre-approve all modifications / alterations, new installations, or additions to water systems, and ensure that these comply with relevant British Standards and L8.
- o. Formally commission modifications / alterations, new installations or additions with relevant drawings and technical data received as required.
- p. Monitor and review the effectiveness of management arrangements and which includes Legionella Risk Assessments / Written Schemes.
- q. Guide and advise colleagues, contractors and Colleges and Professional Services.
- r. Report all suspected legionella cases and applicable positive legionella test results to the University (via Health and Safety, Governance & Compliance) immediately, who will then notify the HSE where required.

## **7. DUTIES OF COLLEGES AND PROFESSIONAL SERVICES<sup>3</sup>**

Each College / Professional Service is responsible for College / Service 'owned or operated' equipment / systems and associated pipe work attached to the water system infrastructure or which has its own independent water reservoir.

Responsibility extends to the implementation of and cooperation with safety measures established by the University, PACS, the Competent Person and others, to ensure the health and safety of staff, students, contractors and visitors to their College / Service.

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<sup>2</sup> As defined by ACOP L8: The Control of Legionella Bacteria in Water Systems

<sup>3</sup> See Information Sheet: Managing Legionella Risks associated with College / Service Owned Equipment

As such, each College and Professional Service will where applicable:

General:

- a. Identify and assess the risk of exposure to the legionella bacteria from College / Service owned or operated equipment or relevant plant / pipe work attached to the water system.
- b. Abide by local water by-laws and ensure there is no risk of back siphoning of water from equipment or hoses directly connected to the mains water supply.
- c. Introduce and monitor arrangements to ensure relevant items are operated, maintained and cleaned as required to prevent the risk of exposure to legionella bacteria.
- d. Provide staff, students, short-term employees, visiting academics and others under their control with appropriate training or information on the safe operation of relevant items.
- e. Ensure Contractors or others appointed to undertake work on relevant items receive appropriate information regarding any risks and associated controls.
- f. Obtain prior approval from the Competent Person before any modifications, alterations or additions to the water infrastructure are carried out.
- g. Ensure records are kept, as appropriate, e.g. maintenance, test and inspection records.
- h. Report all suspected legionella cases to the Head of Health and Safety immediately.

For Water Spray Systems / Humidification Systems / Systems linked to Water supply Infrastructure

- i. Notify the Competent Person within PACS before such systems or equipment are purchased / installed / commissioned and decommissioned and when removed / disposed.
- j. Ensure systems are not used until a Legionella Risk Assessment / Written Scheme has been prepared.
- k. Implement any controls outlined in the Legionella Risk Assessment / Written Scheme, including maintaining a log of all 'owned' water spray misting and humidification equipment with records of inspections, tests and maintenance carried out on the system / equipment kept.

## **8. ADDITIONAL DUTIES FOR COMMERCIAL SERVICES**

In addition to those responsibilities and duties detailed above (Section 7) Commercial Services shall also ensure:

- a. Weekly (or at periods agreed by the Competent Person) run-off of showers and taps within empty rooms of otherwise occupied halls of residences. Time required for run-off should be advised by the risk assessment or be separately calculated to ensure adequate throughput of water to prevent stagnation.
- b. Notify PACS of all empty residential blocks, corridors or wings and the closures of entire halls of residences, and implement controls advised by the Competent Person.
- c. Contract management of 3<sup>rd</sup> party halls providers, confirming with the assistance of the Competent Person that legionella risks are suitably managed.
- d. Flushing weekly (or at periods agreed by the Competent Person) of infrequently operated showers within Sports facilities.
- e. Relevant sports field irrigation or wetting systems are suitably risk assessed and maintained.
- f. All ice making and humidification/misting systems are suitably risk assessed and maintained.

- g. Records of all maintenance activities, flushing etc. are kept.

## **9. DUTIES OF STAFF AND STUDENTS**

Every member of staff and student must:

- a. Not interfere with or misuse systems / equipment supplied in the interest of safety.
- b. Operate equipment in accordance with good practice and any local safety rules.
- c. Report any concerns to their Supervisor, Line Manager, local H&S Coordinator or directly to Health and Safety.
- d. For residential (Halls) students, notify Halls Office of absences over 7 days and early termination of contract.

## **10. DUTIES OF CONTRACTORS**

All contractors employed to work on the fabric / infrastructure of any University building are responsible for ensuring that they and any sub-contractors reporting to them carry out their activities in such a way that it complies with the requirements of this Policy and the ACOP: L8.

## **11. REPORTS OF SUSPECTED LEGIONELLA CASES / POSITIVE LEGIONELLA TESTS**

All suspected legionella cases and / or positive legionella tests must be reported to the Head of Health and Safety immediately. The Head of Health and Safety will then determine what action needs to be taken on a case by case basis liaising with PACS, the Competent Person and others within the institution as required. The Head of Health and Safety will report all confirmed cases of Legionnaires' disease to the HSE.

## **12. EQUALITY IMPACT ASSESSMENT**

This Policy should have no adverse bearing of those with a protected characteristic.

## **13. FURTHER GUIDANCE**

- L8: The Control of Legionella Bacteria in Water Systems Approved Code of Practice.
- Information Sheet: Managing Legionella Risks with College / Service Owned Equipment.

## **14. REVIEW AND AUDIT PROCEDURES**

Health and Safety, Governance and Compliance, will carry out general and periodic audits to ensure compliance against this Policy and legislation in general.

Colleges / Professional Services must periodically review their own procedures to ensure the requirements of this Policy are implemented, suitable and effective.

In addition, the University's Health and Safety Committee may from time to time review the effectiveness of this Policy.

**End.**