

Legionella and Water Management Policy

Date of adoption October 2024

Date of Review July 2026

Policy Aim

The objective of the Tickhill Town Council Legionella Policy is to control, prevent and minimise the risk from Legionella to the public, staff and hirers using the pavilion, so far as reasonably practicable by designing, operating and maintaining plant and equipment in accordance with the Approved Code of Practice and Guidance Policy (ACoP L8).

This Policy:

- Clearly defines roles and responsibilities.
 - Confirms Tickhill Town Council's resolve in preventing or minimising the risk from Legionella.
 - Affirms Tickhill Town Council's commitment to have in place control measures that comply with the Health and Safety Executive (HSE) Approved Code of Practice ACoP Guidance L8 and HSG274 & LCA Code of Conduct 701.18 04-21
 - Requires Tickhill Town Council to have a control assurance system in place to endeavour to ensure the measures are being implemented, are effective, records are kept, and the policy is reviewed on an annual basis.
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1. Statutory Requirements

Legionnaires' Disease – Technical Guidance ACoP L8 and HSG274

- 1.1** The Health and Safety at Work Act 1974 sets out the broad legal requirements for health, policy for the Control of Legionella Bacteria in Water Systems, safety and welfare of employees/tenants and others (including visitors, contractors and the general public).
- 1.2** Beneath the Act are a series of regulations which describe more detailed obligations, such as the Control of Substances Hazardous to Health Regulations (COSHH) 2002.
- 1.3** Further documents include Approved Code of Practice and Guidance (ACoP L8) and HSG274 (HSE Technical Guidance), which serves to interpret the regulations more specifically. In respect of this policy, the Health and Safety Commission's 'ACoP L8 – Legionnaires' Disease. The control of legionella bacteria in water systems explains the requirements of COSHH in respect of Legionella.

2. Legionella

- 2.1** The term Legionellosis covers Legionnaires Disease, Pontiac Fever and Lochgoilhead Fever. Legionnaires disease is a Pneumonia that principally affects those who are susceptible due to age (especially young or old), illness, immunosuppression, smoking etc. and may be fatal. Legionella can also cause less serious illnesses which are not fatal, but which can affect all people
- 2.2** Although Legionella bacteria are water-borne organisms, transmission of the disease is by inhaling water droplets in the form of an aerosol that contains the Legionella bacteria. Legionella are widespread in natural sources of water. They may enter man-made systems or water services where they multiply under certain favourable conditions, i.e. water held between 20°C and 45°C, such as: running showers, spa bath equipment or cooling towers that can generate aerosols. Other sources include humidifiers and air washers.
- 2.3** ACoP L8 sets out the guidance to those with health and safety responsibilities to help comply with legal duties in relations to legionella. For example, for those responsible for the premises, a basic framework is set out for preventing further outbreaks of the disease by giving advice on the management and selection, training and competence of appropriate personnel and any Specialist Contractor's.
- 2.4** Responsibilities of manufacturers, installers of products and service providers are also included.
- 2.5** The following present a risk of Legionellosis:
- Water systems incorporating an evaporative type cooling tower.
 - Water systems incorporating an evaporative condenser.
 - Hot and cold-water systems. Other plant and systems containing water which are likely to exceed 20°C and may release a spray or aerosol during operation, when being maintained or tested may also present a risk. For example, fire-fighting systems that are permanently charged with water often forming long dead legs, may represent a risk when tested, e.g. Hose Reels.
- 2.6** Tickhill Town Council Council will manage the risk of Legionella in accordance with the latest edition of ACoP L8 Guidance L8, (Legionnaires' Disease. The control of legionella in water systems) and HSG274.
- 2.7** Under ACoP L8, and in accordance with COSHH regulations, there is a requirement to carry out an assessment to identify and assess the risk from Legionella associated with all water systems on site. It is then necessary to implement a Legionella Management Programme and demonstrate that all necessary steps to achieve and maintain adequate control have been considered and implemented as far as reasonably practicable.
- 2.8** ACoP L8 and HSG274 will be the guidance for the Tickhill Town Council Legionella Policy.

3. Objectives

Tickhill Town Council will have in place:

- Regular Risk Assessment: to identify and assess sources of risk from Legionella.
- Action Plan: which puts in place control measures that take account of the Risk Assessment and prevents to minimise the risk from exposure to Legionella.
- Safe Working Practices: implement and manage the scheme of precautions and other measures in compliance of the Policy. Nominate a Duty Holder responsible to oversee and implement the scheme of precautions.
- Assurance of Control: implement monitoring and recording procedures to endeavour to ensure that the measures put in place are adequate and effective.
- Training: regular training of all personnel involved, to endeavour that they have a level of knowledge and competence commensurate with their involvement in the control procedure.
- Risk Assessment: review the Risk Assessment at least every two years or if any significant changes occur to the system.
- Policies: reviewed at least annually, or more regularly if any legislation has been implemented.
- Purchase and install equipment for new projects, schemes or replacement programmes, which prevent and/or minimises the risk.

4. Roles and Responsibilities Management and Responsibilities

4.1 It is essential that adequate management of financial resources are made available for prevention or minimising the risk arising from Legionella within the property. It is importance that all personnel, whether involved in assessing risk, carrying out precautionary measures, planned preventative maintenance and those carrying out refurbishment or alterations are competent, trained and aware of their responsibilities.

4.2 Duty Holder: Clerk to the Council

- Responsible for the issue of the Legionella Policy.
- Has a duty to comply with ACoP L8 & HSG274
- Has sufficient knowledge to be able to competently carry out this role and undertake regular training.

4.3 Responsible Person: Clerk to the Council

- Will be responsible for communicating the Legionella Policy, will take a lead role in its implementation and will propose amendments to the Legionella Policy that may be necessary in the future.
- Endeavour to provide resources for implementing the requirements of the ACoP L8; Shall nominate, in writing, all Deputy Responsible Persons.
- Responsible for the issue of a Water Safety Plan (Written Scheme of Control).
- Endeavour that all the maintenance, capital development project team and measured term contractors comply with HSG274, ACoP L8 and the Legionella Policy.
- Endeavour that all Operatives are competent and receive suitable training regarding the control of legionella bacteria.
- Appoint a Legionella Control Association accredited consultancy or a reputable water treatment company to carry out a review of the risk assessment as least every two years, and/or when major changes to the use of the building are made, control measures are ineffective or if Legionnaires' Disease is associated with the system.
- Remedial actions resulting from the risk assessment and those contained in the written scheme are carried out in full and are recorded diligently.

- Manage the maintenance operations and planned preventative maintenance activities of the facilities and assets regarding Legionella in accordance with all relevant regulations and the Legionella Policy.
- Organise and ensure regular meetings are carried out, to discuss Legionella and water treatment.
- Endeavour that sample testing is undertaken by an UKAS accredited laboratory.

5. Action in the Event of a Legionella Detection

Domestic Water Services (Hot and Cold Water) (Ref: Table 3 – HSE L8)

Legionella Bacteria (cfu/litre)	Action Required
More than 100 but less than 1000	Either: a) If only one or two samples are positive, the system should be resampled. 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. b) 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 and other remedial action required.
More than 1000	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.

6. Action in the Event of a Legionella Outbreak (HSE L8)

- 6.1** An outbreak is defined by the Public Health England (PHE) as two or more cases of Legionellosis 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.
- 6.2** It is the responsibility of the appointed Duty Holder for the declaration of an outbreak.
- 6.3** Whoever receives an enquiry or notification regarding an outbreak of Legionellosis, whether alleged to be connected with any site owned by the Parish Council, or in the immediate area of where the source has not been proven, must immediately notify the relevant person, to see if the staged emergency escalation procedure needs to be activated.
- 6.4** The Clerk to the Council will be the main contact for the investigation appointed officer.
- 6.5** The staged emergency escalation procedures will detail what actions are to be taken, and by whom, with the primary purpose being to protect public health and prevent further infection. 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.

6.6 The Local Authorities 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.

6.7 As part of an outbreak investigation and control, the following requests and recommendations may be made by the enforcing authority:

- To shut down any processes which are capable of generating and disseminating airborne water droplets and keep them shut down until sampling procedures and any remedial cleaning or other work has been done. Final clearance to restart the system may be required.
- To take water samples from the system before any emergency disinfection being undertaken. This will help the investigation of the cause of illness.
- Investigating officers from the Local Authority may take samples or require them to be taken.

To provide staff health records to discern whether there are any further undiagnosed cases of illness, and to help it prepare case histories of the people affected.

- To cooperate fully in an investigation of any plant that may be suspected of being involved in the cause of the outbreak. They may involve, for example:
 - Tracing of all pipework runs;
 - Detailed scrutiny of all operational records;
 - Statements from plant operatives and managers;
 - Statements from water treatment contractors or consultants.

6.8 The Responsible Person, will be responsible for ensuring that the requests and recommendations made by the enforcing authority are implemented.

6.9 Any infringements of relevant legislation may be subject to a formal investigation by the appropriate enforcing authority.

6.10 In the event of an outbreak, it may be necessary to close the pavilion to hirers. All hirers will be informed immediately and the building closed

7. Implementation

Tickhill Town Council will be responsible for this policy; ensure that all employees and contractors are aware of their legal responsibilities and duties; provide training as necessary.

As the Council's Safety Officer, the Clerk will implement the Legionella Control Policy; keep informed of relevant legislation; ensure that actions that have been approved by the Council to remove or mitigate against risk are carried out; ensure all contractors are aware of their legal responsibilities and duties.

Failure to do so may result in Disciplinary Action being taken against staff or Councillors being reported to Doncaster Council Monitoring Officer under the Code of Conduct.

8. Monitoring

The policy will be monitored in the following ways:

Monitoring Activity	Person Responsible
Any breach of the policy to be reported to the Clerk/Admin Support Assistant	Anyone
All reports will be investigated and remedial action taken if required	Clerk/Admin Support Assistant
Undertake the following cleaning and monitoring actions in line with the legionella log book at the pavilion; ○ Water temperature testing ○ Flushing of assets Descaling assets	Grounds Lengthsman carries out weekly testing checks which are checked every 6 months by the Clerk/Admin Support Assistant
Legionella risk assessment undertaken annually	Clerk in conjunction with specialist provider
Legionella awareness training up to date for all staff	Clerk in conjunction with all staff and specialist training provider

Date reviewed: July 2026

Approved by Full Council

Review Date: Every two years or as legislation changes

Next review date: July 2028