LONDON METROPOLITAN UNIVERSITY

Control of Legionella Policy

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Introduction

This policy sets out how London Metropolitan University will take all reasonable precautions to ensure that its staff, students, contractors, and visitors are not exposed to Legionella bacteria from building services, including hot, cold, and cooling water systems, while on its premises.

Scope

Legionnaires' disease is a potentially fatal illness caused by Legionella bacteria, which can be contracted through the inhalation of very small water droplets or aerosols containing the bacteria. Legionella is widespread within the environment, and it may enter and proliferate in water systems, including cooling towers and hot and cold water services. This is only possible if the perfect environment is present.

Legionella thrives at temperatures between 20°C and 45°C and if a supply of nutrients such as rust, sludge, scale, algae, and other forms of bacteria is present. Robust monitoring and control processes are therefore essential to minimise the risk of exposure.

In fulfilling its legal obligations, the University complies with the Health and Safety Executive's Approved Code of Practice and Guidance L8, *Legionnaires' disease: The control of Legionella bacteria in water systems*, and further references HSG274, Parts 2 and 3.

Roles and Responsibilities

1. The Vice Chancellor

The Vice-Chancellor is ultimately responsible for the management and control of Legionella risks in accordance with the ACoP L8, who discharges this duty through to the Director of Estates, who:

Appoints members of staff to fulfil the following roles:

- The Senior Estates Infrastructure Manager (SEIM) is responsible for managerial and delegated responsibility for the implementation of the University's policy and for the management of the water systems across the Estate in accordance with the ACoP L8.
- The Head of Estates Operations deputises for the SEIM in their absence.
- Deans of Schools are responsible for management and control of legionella risks for School's equipment. Their duties are listed in Section 11.
- Responsible to identify and assess the sources of risk from systems on the University estate, in other words, to undertake legionella risk assessments.
- Has in place a system for managing the risks identified through either prevention or control measures i.e., the Written Scheme of Control.
- Monitors water systems and implement agreed remedial measures where these become necessary to control the risk.
- Maintains adequate records of maintenance, monitoring, testing, disinfection

and pasteurisation of the water systems necessary to demonstrate compliance with the University's procedures; ACoP L8 and HSG 274 parts 2 and 3.

2. Estates Senior Infrastructure Manager

The Estates Senior Infrastructure Manager (SEIM)Advising the appointed specialist sub-contractor of any water systems on London Metropolitan University premisses which require a legionella risk assessment, including those in the schools.

- Managing the specialist sub-contractor to:
    - Conduct legionella risk assessments and implement the findings.
    - Implement the Maintenance and Testing of Hot & Cold Water & other water systems.
    - Implement remediation where the control programme is seen to be failing.
    - Maintain an asset register of all water-based systems.
    - Maintain all records for a period of 5 years (by the Facilities Management contractor).
- Liaise with Facilities Management Contractor and ensure that they perform at least annually a review of the testing and monitoring data producing an audit report and addressing any concerns found.
- Ascertain that the Facilities Management Contractor carries out an annual review with the sub-contractor responsible for testing & monitoring and any actions raised are addressed.
- Liaise with Business Services (London Met staff) and Facilities Management Contractor for sub-contractor management, to ascertain records of training and competence for all involved in Legionella control for the University are kept.
- Maintain copies of Water Risk Assessments (see section 6).

The Head of Estates Operations will undertake the duties of the SEIM in their absence.

3. Deans of School

- Ensure that risk assessment for procedures and equipment operating with water consider the risk of legionella.
- Advise the Estates Department of any equipment that uses or operates with water where a risk assessment has highlighted the risk of legionella, so that the Estates Department can arrange via their specialist sub-contractor to undertake a legionella risk assessment on the equipment.
- Ensuring that identified departmental equipment is maintained to the standard necessary to control the risk of legionella, as advised by the legionella risk assessment.
- Providing suitable and sufficient resources to enable compliance with ACoP L8 for equipment under the School's control.
- Keeping records of equipment servicing and maintenance.
- Facilitating any monitoring or inspections.

- Ensuring no modifications, alterations or additions to water systems are carried out unless Estates have been notified and approval granted.

Schools are responsible for minimising the likelihood of the colonisation of legionella for items of equipment under its control and ensuring it does not present a risk of infection when the equipment is used, maintained or repaired.

Schools and Departments can seek advice from Estates and/or the Health & Safety Team.

4. Project Team/Project Managers

- Ensuring that any works undertaken meet all current water Regulations and the HSE's ACoP L8 and HSG 274.
- Ensure that the works do not increase any Legionella risk, and where possible reduce this risk.
- Advise the University appointed sub-contractor of any works so the sub-contractor can arrange for a Legionella risk assessment, update the asset registers, and implement control schemes for the new/modified systems.

5. The University appointed Facility Management (FM) Company

- Is responsible for undertaking, implementing and maintaining all the required legionella risk assessments, the risk assessment remedial actions, monitoring and testing of the systems as defined by the legionella risk assessments and HSG 274 part 2, specifically table 2.1 and as indicated in Section 6 below.
- Draft the Written Scheme of Control on the behalf of London Met University, in accordance with the specific risks and needs of each building. A written scheme of control is devised and implemented (as stated in the ACOP L8) to design, maintain and operate the water services under conditions that prevent or control the growth and multiplication of legionella bacteria.
- Undertake remedial actions should any system fail to meet the control parameters.
- Is responsible for annual auditing of the delivery of the control testing, monitoring and management, supporting the SEIM and providing expert advice as required.

Procedures

Identification and Assessment of the Risk

The ACoP L8 requires that a suitable and sufficient assessment is carried out for each premises and water systems under the University responsibility to identify and assess the risk of exposure to legionella bacteria. The Legionella risk assessment will meet the requirements of BS8580-1:2019 and be completed by a competent person for all of the building services water systems in University premises e.g., cooling systems, mains water/cold water down services/hot water services across the estate. This will include the pipe work, taps, storage vessels/tanks, calorifiers, heat exchangers, showers etc. which will identify, assess and record the risks. It will also define advised remedial actions to be undertaken and produce a site and system specific maintenance plan to manage any associated risks, identifying the inherent, residual and as low as reasonably practicable risks for the system.

The risk assessment will include the provision of schematic drawings detailing the building services hot and cold-water systems in each building.

Assessment review
The legionella risk assessments will be reviewed on a programme as defined by the initial legionella risk assessment or sooner if changes have been made to the particular system which indicate the documentation is no longer valid.

Where a new system is installed or identified a legionella risk assessment is undertaken on the systems by the approved sub-contractor, and the monitoring and testing regimen recommended by the legionella risk assessment implemented by the specialist sub-contractor.

The legionella risk assessments will include those specialist water systems installed within academic departments which are the responsibility of the Schools but only where these have been identified to Estates by the Dean of School.

Copies of all legionella risk assessments are maintained by the SEIM and stored on the Estates SharePoint at: Estates Operations \ Infrastructure \ Estates Compliance \ Water Management \ 2. Water Risk Assessments, and are issued to the specialist sub-contractor who must update the control scheme for the system risk assessed in line with the recommendations of the legionella risk assessment.

System for Managing the Risk

The following measures are undertaken by Estates for the management and maintenance of the water systems to minimise the risk of Legionella bacteria colonisation. Further detail of each process is provided within the ACoP L8, and HSG 274 parts 2 and 3.

The records are maintained in the appointed sub-contractor portal. The University RP and relevant stakeholders have access to the portal.

Table 2.1 of HSG274 Part 2 provides a checklist for hot and cold water systems,

including guidance on the frequency of inspection and monitoring

Legionella Sampling Program
The microbiological sampling regime is detailed in the London Met Written Scheme of Control which has been developed by the specialist sub-contractor.

Monitoring of Water Systems

The University appointed sub-contractor is assigned to carry out the required maintenance tasks as per the above table and the requirements of the legionella risk assessment. Any non-conformances which are outside the designated control limits are to be remediated and notified to the SEIM.

Control of Legionella in Schools Equipment

The control of legionella in most areas across the University is managed through Estates (as described above). However, some items of equipment which are not considered to be part of the building fabric or infrastructure and are the responsibility of a School may be susceptible to colonisation by legionella bacteria. Such equipment would contain water which is held or circulated at a temperature between 20°C - 45°C and is not maintained by Estates.

Examples of the type of equipment which fall under the responsibility of the School include:

- Hydraulic tanks
- Lathes and machine coolant systems
- Hydrodynamic tunnels
- Laboratory water baths
- Water-jacketed incubators
- Equipment containing a water cooler or purifier
- Fume cupboards with scrubber units
- Machines or tanks which are not permanently plumbed into the building water system
- Other equipment where stored water could be recirculated at room temperature and where there is a potential for the release of airborne water droplets

Actions in the Event of an Outbreak of Legionnaires' Disease

In England and Wales, legionnaires' disease is notifiable under the RIDDOR - Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013. An outbreak is defined as two or more cases that are geographically linked within 6 kilometres by places of residence, work or other type of community setting, with an interval of no more than 28 days between onset dates of consecutive cases and one or more of the following:

- Isolates from clinical and environmental specimens from at least 2 cases are indistinguishable.
- Isolates from respiratory specimens from at least two cases are

indistinguishable.
- Strong epidemiological evidence for link(s) between as cases (e.g. a common workplace).

Projects – Design and Installation

All new water systems will be installed, commissioned and handed over in accordance with the Health and Safety Executives (HSE) Approved Code of Practice ACoP L8, with further reference to their document the control of legionella bacteria in water systems HSG274 part 2, and the control of legionella bacteria in other risk systems HSG 274 part 3.

All water systems within the University will be designed, manufactured and installed to be safe and without risk to health. Designers and installers will ensure the water systems comply with the Water Supply (Water Fitting) Regulations 1999 and are approved by the Water Regulation Advisory Scheme (WRAS).

The design, sizing, layout, construction and commissioning of water systems will comply with the above Regulations.

Low corrosion materials (copper, plastic, stainless steel) should be used where practicable. Non-metallic materials are deemed to be compliant provided they meet BS6920. Certain aspects of water systems will have to comply with the Building Regulations. Water storage tanks must comply with the Water Regulations and the guidance of HSG274 part 2.

Modifications or changes to existing installations should always be carried out with due regard to relevant water, health and safety legislation and BSI Standards, and so they do not increase, and ideally reduce, the risk associated with legionella growth and dissemination.

All associated drawings, legionella risk assessments and test schedules must be updated by the University appointed sub-contractor following new designs or installations and be made available before any ‘hand over’ occurs. It is the responsibility of the Project Team to advise the University appointed sub-contractor of any works being undertaken and completed.

Equipment

Estates are to maintain an asset register, recording all calorifiers, humidifiers, shower heads, sentinel monitor points and relevant plant identified by the legionella risk assessment. Showers and taps are identified by room number, and quantity, rather than individually. These are held by University appointed sub-contractor in the water log books and on the CAFM system.

Emergency Procedures

The following emergency procedures will be implemented where there is a departure from the HSG 274 part 2 control limits for calorifiers, water tanks or water systems.

Control limits for calorifiers, water tanks or water systems.

Total Viable Count (TVC) @22ºC and 37ºC, E Coli, Coliform	• TVC results are trended against previous results, if seen to be rising significantly remediate the system by cleaning and disinfection. If the remedial works have not been effective, discuss the SEIM an alternative action • E Coli, Coliforms, control limit is <1 cfu/ml. If detected, clean and disinfect the cold water tank and re-sample within 2-3 days to confirm effectiveness. If the remedial works have not been effective, discuss the SEIM an alternative action. • All actions and results to be recorded
Positive Legionella Result	• Dependent on the count - see below guide issued by the HSE in HG274 part 2. • All actions and results to be recorded
Hot & Cold Domestic Water High Cold-Water Temperatures	• The situation shall be monitored for a period of 1 week. If the temperature remains above the required 20°C, further advice shall be sought from a specialist. • All actions and results to be recorded
Hot & Cold Domestic Water Low Hot Water Temperatures	• The boiler settings need to be reviewed to ensure that the temperature can be raised. If so, adjust the settings. Further additional temperature checks to be made after 1 week, to ensure that the problem does not persist. If the temperature cannot be raised to the required level, further action is to be taken to ensure the boiler is serviced or checked, or to determine the root cause of the issue. • All actions and results to be recorded
Cold: Dirty Cold-Water Tanks	• Clean and disinfect • All actions and results to be recorded
Hot: Dirty/scaled calorifiers	• Descale clean disinfect • All actions and results to be recorded

In the event of an outbreak of Legionnaires' disease confirmed to originate from London Metropolitan University, the University will fully co-operate with the appropriate authorities. The Duty Holder shall be the assigned point of contact and assemble a crisis management team and follow the appropriate guidance from London Metropolitan University, and specialist consultants.

The Health and Safety Team and the Director of Estates must be informed by

the SEIM of any reading with a detected legionella test of >1000cfu/l.

Table 2.2 of HSG274 Part 2 gives guidance on action to take if legionella is found in the water system.

Information, Instruction and Training

University Staff

- The SEIM and Head of Operations are required to attend a Legionella Responsible Persons training course, relevant to the University assets and systems.

- University Project managers are required to attend a Legionella Awareness training course relevant to the University assets and systems.

- Training should be refreshed every 3 years, or sooner in the event of updates in Legislation, Regulation or Health and Safety Executive's ACoP or technical guidance.

- The SEIM and Head of Operations are required to be assessed as competent for the role by independent competence checks, initially and then reviewed 3-yearly.

The University appointed sub-contractor staff and The University appointed Water Consultant

- The University appointed sub-contractor, staff and the University appointed Water Consultant must be evidenced as trained and confirmed as competent for the tasks they undertake on behalf of the University prior to undertaking any works, this includes any specialist sub-contractors and the main University appointed sub-contractor used.

- Evidence of training and competence must be provided to the SEIM.

Records and Monitoring

Records will be kept of the maintenance, monitoring, testing, disinfection and pasteurisation of the water systems necessary to demonstrate compliance with the University's procedures and the ACoP L8 and HSG 274 parts 2 and 3.

Records of all activities regarding legionella control as advised by ACoP L8 are held by the University appointed Facilities Management Contractor. They are monitored by the University appointed RP (Estates Senior Infrastructure Manager) monthly and quarterly; the specialist sub-contractor audits every 12 months, and University appointed sub-contractor's internal H&S team audit annually. Reports of all the audits are issued to the SEIM for review.
Copies of audit reports are held by University appointed sub-contractor and are reviewed in regular management meetings. Attendees are SEIM, Head of Operations,

representative of the Health & Safety Team, and the appointed specialist sub-contractor account manager.

A full asset register for the water systems forms part of the planned maintenance system.

Copies of logbooks, and test results are held by University appointed sub-contractor and made available to the University Estates department.

Legislation and standards.

In addition to the relevant statutory requirements for the control of Legionella bacteria in water systems, several other Codes of Practice and guidance documents apply to Legionella risk management, as follows:

- Legionnaires' disease: The control of Legionella bacteria in water systems (Approved Code of Practice and Guidance L8) https://www.hse.gov.uk/pubns/books/l8.htm
- HSG274 Part 1: The control of Legionella bacteria in evaporative cooling systems https://www.hse.gov.uk/pubns/priced/hsg274part1.pdf
- https://www.hse.gov.uk/pubns/priced/hsg274-part1.htm
- HSG274 Part 2: The control of Legionella bacteria in hot and cold water systems https://www.hse.gov.uk/pubns/priced/hsg274part2.pdf
- HSG274 Part 3: The control of Legionella bacteria in other risk systems https://www.hse.gov.uk/pubns/priced/hsg274part3.pdf
- Legionella and legionnaires' disease: Guidance for duty holders https://www.hse.gov.uk/legionnaires/

The hyper-links give access to the most up to date version of these documents directly from the HSE website.