

Water Safety Policy
for
Emmanuel Christian School
Leicester

Date of policy: August 2025

(Reviewed by Governors August 2025)

Prepared using the HSE publication Managing legionella in hot and cold water systems

This policy sets out the control of Legionella in hot and cold water systems in the school, including responsibilities, training, testing and records.

1. POLICY STATEMENT

The school will undertake to ensure compliance with the relevant legislation with regard to the Control of Legionella in hot and cold water systems for all pupils and staff 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.

2. THE LAW

Duties under the Health and Safety at Work etc Act 1974 (HSWA) extend to risks from legionella bacteria, which may arise from work activities. The Management of Health and Safety at Work Regulations (MHSWR) provide a broad framework for controlling health and safety at work. More specifically, the Control of Substances Hazardous to Health Regulations 2002 (COSHH) provide a framework of actions designed to assess, prevent or control the risk from bacteria like Legionella and take suitable precautions.

3. 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.

4. MANAGEMENT

The School will ensure that:

- Relevant risk assessments are carried out and that control measures are implemented (see below).
- Appropriate training is provided (see below).
- The Legionella Competent Person is appointed and carries out his/her tasks as defined below.
- The Headteacher is informed of any problems with water or the water system.
- Monitor disinfection procedures where necessary – see Appendix 2.
- Records are kept for each water outlet of flushing and testing and any disinfection procedures.

LEGIONELLA COMPETENT PERSON

The Headteacher is the nominated competent person for Legionella on the premises and acts on behalf of the School to provide the necessary competence to enable Legionella to be managed safely. Other nominated members of staff have agreed to take responsibility for certain aspects of water testing.

In his/her absence the role reverts to Peter Allen

- He/she is to complete training as defined in the Information, Instructions and Training section (below).
- The Legionella Competent Person will ensure that all periodic and exceptional recording, flushing, cleaning and general Legionella management tasks are correctly completed and recorded in accordance with this policy (Appendix 1).
- He/she will advise the teachers/ governors of any condition or situation relating to Legionella which may affect the safety of any premises users.
- He/she is to work within their level of competence and seek appropriate guidance and direction from the Headteacher and/or the Governors as required.

5. 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.

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.
- The School stores and distributes hot water above 50°C. Users 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. Checks are required to ensure that the valves are working correctly.

- All illnesses due to the legionella species are known collectively as “legionellosis” but the most well-known is “Legionnaires’ disease” which can be serious for elderly people and others with respiratory problems or immuno-deficiency.
- 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.
- Control is normally achieved by suitable design and maintenance of the water system and its associated plant. Additional control is achieved by appropriate storage of water and delivery of water at temperatures which do not allow the bacteria to proliferate.

6. RISK ASSESSMENT

Assessment of risk is mostly confined to:

- Monitoring whether control measures are being implemented fully.
- Correct water temperatures are being maintained.
- Engineering measures, such as temperature control valves, are working properly.

7. CONTROL MEASURES

To achieve ongoing control of legionella, thorough flushing of the water system is required alongside any engineering controls.

Effective control measures will require the school to:

- Monitor any water outlets that are not in regular use.
- Record the flushing of all water outlets.
- Record the temperature of hot and cold water outlets.

8. TESTING ARRANGEMENTS

a. Under certain circumstances, for example when there have been alterations or maintenance work to the water system, testing is to be carried out in accordance with Appendix 1.

b. Disinfection of the system will be necessary when testing indicates there is a sufficient level of legionella present in the water system to require treatment - see Appendix 2.

c. Full details of flushing and testing regimes that need to be carried out can be found in the procedures Appendix 1.

9. INFORMATION, INSTRUCTION AND TRAINING

- The school will ensure that suitable and sufficient training and information is given to the Legionella Competent Person, and any other member of staff, who has responsibilities for flushing, record keeping and taking temperature readings as required by the appendices.

Any new measures that are introduced to control legionella will need appropriate training provision. The school will maintain a written record of all instruction and training given to members of staff.

These procedures have been followed since October 2017

Review date

This policy will be reviewed and revised by the Governors as part of our health and Safety policy every 2 years.

Appendix 1

FLUSHING AND TEMPERATURE TESTING PROCEDURES.

1. FLUSHING

All water outlets (hot & cold) will be flushed through weekly (but see para c below) and a record will be kept in writing on the water outlet flushing checklist by the person carrying out the flushing.

Flushing will last for at least two minutes at a reasonable flow rate.

Where water outlets are routinely used, then this acts as the flushing routine and additional flushing is not required. However, flushing will always be required for all water outlets during periods of non use which exceed four days. Flushing is only required at the end of the period of non use.

2. TEMPERATURE TESTING

A single cold and hot tap on the main hot and cold water systems, which are not connected via a thermostatic mixing valve, are each to be run for at least two minutes every month so that a temperature can be taken using a thermometer and recorded on the Water Temperature Check List.

The cold water outlet temperature should be below 20°C after two minutes running.

The hot water outlet temperature should be above 50°C after two minutes running.

If these temperatures cannot be maintained, then professional assistance must be sought immediately

Scientific tests may be required when there appears to be a problem with the water supply, e.g. discolouring, temperature problems, etc..

- If a positive Legionella test is reported there will be a re-test every 3 or 6 months, dependent upon the test results, until two consecutive clear readings are established.

Appendix 2

PROCEDURE FOR DISINFECTION

If the school produces a sufficiently high result after testing, it will be need to be disinfected by an approved contractor.

The Competent person will arrange the time and date of disinfection with the selected contractor

Affected areas will be withdrawn from use until disinfection has been completed. Flushing of outlets in these areas will cease until disinfection has been completed.

A supply of clean water for the kitchen area will be drawn off from an uncontaminated source and stored in containers on the morning of a disinfection visit.

Once disinfection commences, the water system will not be usable (except in WC's) until the contractors declare it safe. (Note: Drinking water must only be drawn from the bottled supply).

Alternative hand cleaning methods will be instigated to supplement the wearing of protective gloves for personal care. (for example hygienic wipes)

Staff and pupils will be protected from accidental use or drinking of disinfected water by securing the outlets or denying them access.

Disinfected areas will be re-instated immediately after completion of the disinfection process and the flushing regime will recommence.

Scheme of Control

Forms for recording the following control measures are displayed in the cupboard on the main corridor. Further copies can be printed out from the master spreadsheet as required.

Monthly

- 1) Take all temperatures at sentinel outlets - 'sentinel' outlets (furthest and closest to each tank or cylinder) for monthly checking of the distribution temperatures.
- 2) Take temp at flow and return from calorifier (hot water boiler/source)
- 3) Take temperature at supply to tap or TMV if installed (thermostatic mixer valve)
- 4) Check all taps for scale

Quarterly

- 1) Showers- clean and descale all heads

Six monthly

- 1) Take temperature of cold water storage tank (CWST) at ball valve and remote from valve
- 2) Inspect log book and review management procedures

Annually

- 1) Visual inspection of cold water storage tank (CWST)
- 2) Visual inspection of internal surfaces if possible (carried out at the annual heating service).

