# Control of Legionella Bacteria within Water Systems

**Originator name:** Director of Estates and Facilities Management  
**Section / Dept:** Estates and Facilities Management  
**Implementation date:** March 2015  
**Date of next review:** March 2017  
**Related policies:** Health and Safety Policy  
**Policy history:** First Policy in new format

## Version History

<table>
<thead>
<tr>
<th>Version</th>
<th>Author</th>
<th>Revisions Made</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Derry Caleb</td>
<td>First Draft</td>
<td>9th March 2015</td>
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## Approval History

### Equality Analysis

<table>
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<tr>
<th>Version</th>
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<th>Comments</th>
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<tr>
<td>1</td>
<td>Equality &amp; Diversity Jo McCarthy-Holland</td>
<td>Low Equality Impact Assessment approved</td>
<td>12 March 2015</td>
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## Committee Sign Off

<table>
<thead>
<tr>
<th>Version</th>
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<tbody>
<tr>
<td>1</td>
<td>Health and Safety Committee</td>
<td>19 March 2015</td>
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## 1 Introduction

### 1.1 Purpose

1.1.1 To define the responsibilities and procedures for managing the control of *Legionella* bacteria within University of Surrey water systems and equipment, to demonstrate compliance with legal requirements, and to ensure effective management of risk.

### 1.2 Scope

1.2.1 This policy applies to all areas of activity associated with the University and applies to all staff, students, contractors and all University of Surrey controlled premises and activities.

### 1.3 Equality Analysis

1.3.1 The University is strongly committed to equality of opportunity and the promotion of diversity for the benefit of all members of the University community. The University’s approach is to promote equality across the full range of its activities, in employment, teaching and learning and as a partner working with and within local, national and international communities. Equality analysis has been carried out in this context.

### 1.4 Definitions

1.4.1 Duty holder – the person in control of the premises, where man-made water systems are used that could be a potential source for legionella bacteria growth. To comply with their legal duties they should:

- identify and assess sources of risk.
- prepare a written scheme for preventing or controlling the risk
- implement, manage and monitor precautions
- keep records of the precautions
- appoint a competent person with sufficient authority and knowledge of the installation to help take the measures needed to comply with the law

Responsible person - a competent person or persons to take day-to-day responsibility for controlling any identified risk from legionella bacteria, known as the ‘responsible person’. It is important for the appointed responsible person to have sufficient authority, competence and knowledge of the installation to ensure that all operational procedures are carried out effectively and in a timely way.

#### 1.4.2 Competence, Training and Briefing

- Competence is based upon training and is equipping staff, students (and others where the University has a duty-of-care) with relevant skills and knowledge to deal appropriately with a given Health and Safety situation.

Briefing is informing such persons of relevant knowledge in relation to Health and Safety.

Training and briefing will be made available in a range of formats according to the needs of the trainee and different groups of staff, students and others.

#### 1.4.3 Accessibility

- The duty to make reasonable adjustments, as far as possible, to ensure that all staff and students (and others where the University has a duty-of-care) with a disability have equal access to everything they need to do a job or studies as those persons without a disability.

### 1.5 Legislative context

1.5.1 This Policy complies with the requirements of the Health & Safety at Work Act 1974 (and other associated legislation) and in particular The Control of Substances Hazardous to Health Regulations 2002. This is supported by an Approved Code of Practice dedicated to the control of legionella bacteria in water systems (L8 (fourth edition 2013). This ACoP provides a practical regime for controlling legionella in water systems and complying with statutory requirements.

### 1.6 Health & Safety Implications

1.6.1 This Policy forms part of the University Health and Safety Policy.
## Policy

### Principles

#### Policy statement

As far as is reasonably practicable the University intends to adopt the principles of control and management identified in HSE Approved Code Practice and Guidance Document L8 ‘The Control of Legionella Bacteria in Water Systems (ACOP L8)’.  

To comply with its legal duties the University will:

- Identify and assess sources of risk
- Prepare a scheme for preventing or controlling the risk.  
- Implement, manage and monitor all precautionary control measures identified
- Keep records of precautionary measures
- Identify responsibilities of employees and contractors within the University establishment
- Put in place an escalation process to advise appropriate management as necessary

#### Commitment

The University intends to adopt as far as reasonably practicable the principles of control and management identified in the current edition of the H.S.E Approved Code of practice and Guidance Document L8 “The Control of Legionella Bacteria in Water Systems” (ACOP L8 4th Edition 2013).  

To comply with its legal duties the University will:

- Identify and assess sources of risk. This includes checking whether conditions are present which will encourage bacteria to multiply, e.g. the water temperature between 20°C and 45°C, is there a means of creating and disseminating breathable droplets e.g. the aerosol created by showers; and if there are susceptible people who may be exposed to the contaminated aerosols.
- Prepare a scheme for preventing or controlling the risk
- Implement, manage and monitor all precautionary control measures identified
- Keep records of precautionary measures
- Identify responsibilities of employees and contractors within the University establishment

### Procedures

#### Arrangements

Detailed procedures are contained within the Control of Legionella Bacteria within Water Systems Policy and Procedure.  

This document is the responsibility of the Director of Estates and Facilities.

#### Roles & Responsibilities

The Universities responsibilities are listed below.

**Director E&FM**

- To be the duty holder
- To appoint a responsible person and delegate authority to ensure compliance
Principal Mechanical Engineer

- To be the Responsible Person. The Duty Holder has appointed a responsible person (Principal Mechanical Engineer) and has delegated authority to ensure compliance
- To develop and produce Policies and good practise guidelines where appropriate on the control of legionella and water systems

Mechanical Engineer.

- To be the Deputy Responsible Person (Maintenance)
- Ensure compliance with policy and procedure
- Order works from appropriate suppliers and providers as necessary
- Ensure the Monitoring and Testing Regime is adhered to
- Ensure the Inspection Regime is adhered to
- Facilitate any monitoring or inspection work

Maintenance Team Leaders and Fitters

- Carry out weekly/monthly inspection/monitoring maintenance tasks as instructed
- Ensure all documentation is completed and returned to appropriate person
- Report any possible area of risk observed whilst completing other duties

Specialist Water Treatment Contractors

- Carry out Risk Assessments as instructed and deemed necessary by University staff – every two year
- Carry out tests and inspections on water systems as necessary
- Carry out specific investigations and remedial works as instructed
- Complete fully documented report with any recommendations clearly indicated
- Follow up any actions indicated as necessary not undertaken by the University
- Report any areas of non-compliance to the University Policy or recommendations under ACOP L8 that are present through inadequate resource, lack of training, inadequate performance of individuals or limitation in policy. Initially discussions should be with the Mechanical Engineer but if no change or improvement is observed within a reasonable period (max. 1 month) then the issue should be escalated to the Maintenance Engineer and/or The Principal Mechanical Engineer. The issue should also be reported and any remedial actions taken fully discussed at the regular Legionella Review meeting.

General Contractors

- Ensure compliance with Policy and Procedures
- Develop appropriate Risk Assessments and Method Statements for working on water services systems
- Ensure all appropriate documentation is completed and forwarded to the appropriate person

Designated Persons (Faculties and Directorates)

To assist the Duty holder in fulfilling their obligations under the Approved Code of practice and Guidance Document L8 “The Control of Legionella Bacteria in Water Systems” (ACOP L8) and were applicable Departments/Faculty’s will nominate a Designated person. See Appendix A for a list of Designated persons.

The Designated person is required to:
- Ensure compliance with Policy and Procedure
- Ensure NO modification/alteration or addition to water services are carried out without the approval of the E&FM Department
Director of Health and Safety

- Monitoring policy
- Auditing policy
- Report any incidents under RIDDOR

## 3 Governance Requirements

### 3.1 Responsibility

3.1.1 This Policy is monitored and regularly reviewed by the Director of Health & Safety and the Health and Safety Committee.

### 3.2 Implementation / Communication Plan

3.2.1 The policy should be communicated to relevant staff as part of their local induction process

### 3.3 Exceptions to this Policy

3.3.1 Not applicable

### 3.4 Supporting documentation

3.4.1 See Health and Safety Website
3.4.2 See Control of Legionella Bacteria within Water Systems Policy and Procedure
**APPENDIX A: FACULTY AND DEPARTMENT DESIGNATED PERSONS**

<table>
<thead>
<tr>
<th>Designated Persons</th>
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<tbody>
<tr>
<td>The positions listed below from each faculty/department have been selected due to their responsibility for works in relation to the fabric of the University’s buildings.</td>
</tr>
<tr>
<td>Faculty Arts &amp; Human Sciences : Facilities Manager</td>
</tr>
<tr>
<td>Faculty Business Economics &amp; Law: Facilities Manager</td>
</tr>
<tr>
<td>Faculty Engineering &amp; Physical Sciences: Facilities Manager</td>
</tr>
<tr>
<td>Faculty Heath &amp; Medical Sciences: Facilities Manager</td>
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<tr>
<td>Student Union Chief Executive Officer</td>
</tr>
<tr>
<td>Accommodation: Facilities Manager</td>
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<tr>
<td>Library &amp; Learning Centre: Facilities &amp; Information Officer</td>
</tr>
<tr>
<td>EFM Project Managers</td>
</tr>
<tr>
<td>EFM Team Leaders</td>
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<tr>
<td>C&amp;RS Manager</td>
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Equality Analysis Template for all University Policies

For Equality & Diversity Team to Complete:

<table>
<thead>
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<th>Organisational Sign Off by Equality and Diversity Team:</th>
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<tr>
<td>NAME OF POLICY: Legionella Policy</td>
</tr>
<tr>
<td>☒ Low Equality Impact (Minor input to Policy to reflect equality considerations)*</td>
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<tr>
<td>☐ Medium to High Equality Impact (Equality Analysis template completed)</td>
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<td>☒ Sign off received</td>
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<tr>
<td>Signed off by: Jo McCarthy-Holland</td>
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<tr>
<td>Position: Equality Adviser</td>
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<tr>
<td>Date: 12/3/15</td>
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Note: This Template must be used in conjunction with the associated Equality Analysis Guidance Notes, which can be accessed from the Equality and Diversity Website.

* Confirmation to be obtained from the Equality and Diversity Team where policies are deemed to be Low Equality Impact.