

CONTROL OF LEGIONELLA BACTERIA IN WATER SYSTEMS AND PSEUDOMONAS AUREGINOSA ASSURANCE POLICY

Please be aware that this printed version of the Policy may NOT be the latest version. Staff are reminded that they should always refer to the Intranet for the latest version.

Purpose of Agreement	This document has been produced in accordance with the general requirements of the Control of Legionella Bacteria in Water Systems (Doc L8) and the Control of Legionella, hygiene, 'safe' hot water, cold water and drinking water systems HTM 04-01 Part A (Design Installation and Testing) and Part B (Operational Management). The policy has been compiled to provide guidance to Directors, Managers, Supervisors and Employees on the arrangements for managing Legionella throughout the Trust
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CONTROL OF LEGIONELLA BACTERIA IN WATER SYSTEMS AND PSEUDOMONAS AUREGINOSA ASSURANCE POLICY

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1. INTRODUCTION and PURPOSE

1.1 Legionellosis is the collective name given to the flu like illness caused by Legionella bacteria. This includes the most serious Legionnaires' disease, as well as the similar but less serious conditions of Pontiac fever and Lochgoilhead fever. Legionnaires' disease is a potentially fatal form of pneumonia and everyone is susceptible to infection. However, some people are at higher risk, including:

- People over 50 years of age
- Smokers and heavy drinkers
- People suffering from chronic respiratory or kidney disease
- Anyone with an impaired immune system

1.2 The bacterium *Legionella pneumophila* and related bacteria are common in natural water sources such as rivers, lakes and reservoirs, but usually in low numbers. They may also be present in purpose-built water systems such as hot and cold water systems.

1.3 Outbreaks of the illness occur from exposure to legionella growing in purpose-built systems where water is maintained at a temperature high enough to encourage growth, e.g. cooling towers, evaporative condensers, hot and cold water systems and spa pools used in all sorts of premises (work and domestic).

1.4 If conditions are favourable, "water temperatures between 20°C and 45°C", the bacteria will grow increasing the risks of Legionnaires' disease. The principle route of infection is through inhalation of the bacteria into the lungs. Therefore, it is important to control the risks by introducing measures outlined within this policy.

1.5 *Pseudomonas Aeruginosa* is increasingly important clinically as it is a major cause of both healthcare-associated infections in hospitals and chronic lung infections in people with cystic fibrosis.

1.6 Although *P. Aeruginosa* is an opportunistic pathogen, it can cause a wide range of infections, particularly among immuno compromised people (HIV or cancer patients).

1.7 *P. aeruginosa* is one of the more common causes of healthcare-associated infections and is increasingly resistant to many antibiotics. In hospitals the organism contaminates moist/wet reservoirs such as respiratory equipment and indwelling catheters and infections can occur in almost every body site but are particularly serious in the bloodstream (bacteraemia).

1.8 Solent NHS Trust recognises the legal obligations in relation to Legionella risk management under the health and safety legislation The Control of Legionella Bacteria in Water Systems (Doc L8), and Health Technical Memoranda (HTM) 04-01, by the means of this policy and arrangements, Solent NHS Trust aims to meet these requirements in so far as is reasonable practicable to provide and maintain safe and healthy working conditions, equipment and systems of work for all staff, patients and visitors, and to provide such resources, information, training and supervision as needed.

1.9 The management of Legionella risk will be a continual commitment by the Trust involving regular management and progress meetings refer to section 5, and a commitment to an annual review. The re-assessments will review monitoring, inspection and record keeping requirements (including programme implementation, and system condition).

2. SCOPE and DEFINITIONS

2.1 The scope of the policy applies to all areas of the Solent NHS Trust , the services that it provides, all Managers responsible for buildings, wards or areas within properties and all staff contracted either directly or indirectly employed to work within Solent NHS Trust's properties in line with the organisation Trust's Equal Opportunities Document. This policy applies to buildings whether owned, rented, leased or otherwise provided for the purpose of Solent NHS Trust related activities.

2.2 For the purposes of this Policy and where used the following definitions are applicable:

Aerosol. A suspension in a gaseous medium of solid particles, liquid particles, or solid and liquid particles having negligible falling velocity. In the context of this document, it is a suspension of particles which may contain legionella with a typical droplet size of <5µm that can be inhaled deep into the lungs.

Air-conditioning. A form of air treatment whereby temperature humidity and air cleanliness are all controlled within limits determined by the requirements of the air-conditioned enclosure.

Bacteria (singular bacterium). A microscopic, unicellular (or more rarely multicellular) organism.

Biofilm. A community of **bacteria** and other **microorganisms**, embedded in a protective layer with entrained debris, attached to a surface.

Calorifier. An apparatus used for the transfer of heat to water in a vessel by indirect means, the source of heat being contained within a pipe or coil immersed in the water.

Chlorine. An element used in **disinfection**.

Cold water service. Installation of plant, pipes and fittings in which cold water is stored, distributed and subsequently discharged.

Dead end/blind end. A length of pipe closed at one end through which no water passes.

Deadleg. Pipes leading to a fitting, through which water only passes infrequently when there is draw-off from the fitting. Redundant or abandoned legs of pipework.

Disinfection. A process, which destroys or irreversibly inactivates **microorganisms** and reduces their number to a non-hazardous level.

Distribution circuit. Pipework, which distributes water from hot or cold-water plant to one or more fittings/appliances.

Domestic water services. Hot and cold water intended for personal hygiene, culinary, drinking water or other domestic purposes.

Fouling. Organic growth or other deposits on heat transfer surfaces, causing loss in efficiency.

Hot water service (HWS). Installation of plant, pipes and fittings in which water is heated, distributed and subsequently discharged (not including cold water feed tank or cistern).

legionnaires' disease. A form of pneumonia caused by bacteria of the genus **legionella**.

Legionella. A single bacterium of the genus **legionellae**.

Legionellae. The name of a genus of bacteria which includes over 50 species and belongs to the family **Legionellaceae**. They are ubiquitous in the environment and found in a wide spectrum of natural and artificial collections of water.

Legionella pneumophila. One of the causative organisms of **legionnaires' disease**.

Legionellosis. Any illness caused by exposure to **legionella**.

Lochgoilhead Fever. A less serious condition similar to **Pontiac Fever**. Named after analysis of 187 people who had visited a hotel and leisure complex in Lochgoilhead, Scotland where 170 indicated acute illness. The symptoms were consistent with Pontiac fever-like illness.

Microorganism. An organism of microscopic size including **bacteria**, fungi and viruses.

Pontiac Fever. A disease caused by a species of legionella, an upper respiratory illness less severe than **legionnaires' disease**.

Pseudomonas Aureginosa. A gram-negative bacterium commonly found in soil and ground water. It rarely affects healthy people and most community-acquired infections are associated with prolonged contact with contaminated water.

Sludge. A general term for soft mud-like deposits found on heat transfer surfaces or other important sections of a cooling system. Also found at the base of calorifiers and cold water storage tanks.

Stagnation. The condition where water ceases to flow and is therefore liable to microbiological growth.

3. ROLES & RESPONSIBILITIES

3.1 All relevant persons shall fully appreciate the actual and potential risks of Legionella and the concept of risk management. Although compliance with the guidance may be delegated to staff, or undertaken by contract, accountability cannot be delegated.

3.2 **The Chief Executive Officer (CEO)** will be responsible for ensuring that individual staff are identified and given responsibility for the development, implementation and subsequent monitoring of comprehensive operating procedures to ensure that all aspects of the quality of water supplies within Solent NHS Trust comply with the requirements of this policy. The CEO will ensure that sufficient resources are provided to enable the policy to be implemented and to remain effective.

3.3 **The Nominated Director for Health and Safety (Director of Infrastructure)** will through the Trust Health & Safety Sub-committee be responsible for monitoring compliance with the Control of Legionella Bacteria in Water Systems Policy, generating status reports reporting any significant risks associated with the water quality to the Quality Governance Committee. The Nominated Director for Health and Safety-

- Shall be responsible for ensuring that the requirements of this policy are complied with.
- They shall appoint in writing a Responsible Person (water) (Refer to Appendix 4) who are suitably qualified and competent and who possesses adequate professional knowledge of the control of Legionella to devise and manage necessary procedures to ensure that the quality of water in Solent's NHS Trust premises is maintained.
- They shall appoint in writing a deputy nominated person (water) (Refer to Appendix 5) to whom delegated responsibility may be given. The person will act on behalf of the responsible person in their absence
- They shall appoint in writing a contract supervising officer (refer to Appendix 6) who will act as an independent external assessor to witness tests and checks under the terms of contract. He/she should have specialist knowledge, training and experience of hot and cold water
- Shall ensure that recommendations and requirements identified by the "Responsible Person" are given adequate consideration and priority in the allocation of resources for the management of safe water services.
- Must ensure that the Appointed Person have sufficient authority to ensure that all operational procedures are carried out in an effective and timely manner

3.4 **Responsible Person(s)-Water- (Contracts Manager Keir) and (TWC Water Services Ltd)**

- Shall Appoint in writing a Deputy Responsible Person (Water) to whom delegated responsibility may be given. The nominated Deputy Responsible Person will act on behalf of the Responsible Person in their absence.
- Advise on the potential areas of risk and identify to the Trust where systems do not comply with current standards/guidance and financial implications of managing, reducing or removing the risk(s).
- Advise on the required controls and procedures for the prevention of Legionella bacteria in water systems.
- To operate and maintain the plant and systems in accordance with the policy and procedures for the control of Legionella bacteria in water systems.
- Ensure all water systems have schematic drawings available that are current.
- Ensure that Risk Assessments are carried out annually or after any changes or alterations to the water systems, with advice from competent persons where deemed necessary.
- Ensure adequate records are maintained for the control of Legionella bacteria in water systems.
- To ensure that all staff (directly employed or contractors) are trained in the correct procedures and are aware of the standards required and expected of them in discharging their duties in compliance with the policy for the control of Legionella bacteria in water systems.
- Maintain records of inspections, cleaning, disinfection and pasteurisation regimes, maintenance, alterations, repairs and operational abnormalities.
- Produce assurance reports that all water risk assessments have been carried out and be alerted if any risks have been identified for water quality to the Trust.

3.5 In addition the Responsible Person (Water) shall possess a thorough knowledge of the control of legionella and would ideally be a chartered engineer, microbiologist or other professionally qualified person.

3.6 **Deputy Responsible Person (Water)- (Estates Operative TWC and Kier)**

To undertake the following duties:

- Deputise for the Responsible Person (Water) when they are not available.
- Advise on the required controls and procedures for the prevention of Legionella bacteria in water systems.
- Ensure that Risk Assessments are carried out annually or after any changes or alterations to the water systems, with advice from competent persons where deemed necessary.
- Ensure adequate records are maintained for the control of Legionella bacteria in water systems.
- Monitor the efficacy of the procedures.

3.7 **Hard Facilities Maintenance Team (FM) –**

- is contracted through Kier Facilities Services who through their business strategies and compliance team work within the general duties of the Health and Safety at Work Act and will comply with the approved code of practice and guidance of Doc L8 The Control of Legionella Bacteria in Water Systems and Health Technical Memorandum 04-01 The control of legionella, hygiene, safe hot water, cold water and drinking water systems. The Hard FM team will work within the parameters of Solent's Control of Legionella Bacteria in Water Systems and Pseudomonas Aureginose Assurance Policy and in particular will be in compliance of the Policy Legionella Management
- will as a minimum attend the water safety meeting and Infection Prevention and Control committee meetings and (any other group, committee when requested) and will produce regular legionella reports and present them to the Infection Prevention and Control committee meetings and the health and safety sub committee
- will work with Solent's Estates and Facilities team to identify any appropriate planned or reactive works

3.8 **Managers (Facility Managers, Support Services Managers, Premises Managers and responsible persons both clinical and non-clinical) shall be responsible for:**

- Ensuring that all staff within their area of responsibility are made aware of the contents of this Policy.
- Engaging with the Estates department in identifying and notifying areas of concern regarding incorrect temperatures, discoloured water, or unusual tastes and/or smells issued through the hot or cold water systems.
- Close liaison with the Estates department in identifying areas of low usage or non usage of hot and cold water systems within their areas of responsibility.
- Timely notification to the Estates department (using Appendix 3) of any planned/unplanned closures (either long or short-term) or re-occupancy of a previously closed area.
- Highlighting any concerns regarding the planned/reactive maintenance of their areas that could impact on Legionella management.

3.9 **Health and Safety Manager** will assist in the implementation of this policy. They will be suitably qualified and competent to advise on the requirements outlined in this policy, relevant statutory regulations and/or codes of practice. Health and Safety Manager shall be responsible when there is confirmation of an outbreak (as described in section 6.1) for reporting to the Local Authority whose role is to support outbreaks of infectious diseases to protect public health and prevent further infection. In the event that there is confirmation of an outbreak, the Health and Safety manager will support any investigation that maybe undertaken by any of the following parties Local Authority, Outbreak Control Team, Health and Safety Executive (HSE) or Environmental Health.

3.10 **The Compliance Officer** will be responsible for the continued monitoring/audit of procedures for the control of Legionella bacteria in water systems. They will undertake regular meetings and updates with service providers/contractors to ensure that actions arising from annual assessments and inspections are fully closed out. They will provide demonstrable evidence of compliance to current regulations and policies and provide reports to the Responsible Person (Water) of continued compliance and raise issues of non-compliance as required.

3.11 **Infection Prevention and Control Teams** are responsible for ensuring that the policy and procedures are consistent with all guidelines and policies on infection control. They shall provide specialist advice to the Responsible Person(s) and shall assist in the assessment of risk and recommendations for upgrading and maintaining safe water systems. Infection Prevention and Control will support the responsible person (s) and services in the event of a Legionella outbreak.

3.12 **ALL Employees (permanent/temporary/contract)** will co-operate and assist with the implementation of this Policy and its associated Procedures. Bring to the notice of management, any problems or failings associated with the control of Legionella and promptly report all incidents concerning the risks of exposure to Legionella and or any adverse ill effects arising from Legionella in accordance with Solent NHS Trust incident reporting policy. In case of further guidance required they are to seek specialist advice as necessary from the Responsible Person(s) (Water), Infection Control Team, Occupational Health or the Health and Safety Manager. They will also attend training as required.

4. LEGIONELLA MANGEMENT

4.1 The Control of Legionella Bacteria in Water Systems Policy will seek ratification at the health and safety sub-committee in support of the infection control and the estates and facilities teams.

4.2 **Legionella Monitoring.** Legionella is monitored by the Responsible Person (Water), the Compliance Officer with the aid of the Planned Preventative Maintenance (PPM) Schedule, survey and sampling results and any planned or reactive works.

4.3 **Legionella Sampling and Results.** Testing for Legionella shall be carried out in accordance with the requirements of HTM 04-01 Part B Operational Management. Certificates, surveys and sample results are to be held by the appointed maintenance contractor and also the Estates and Facilities Team.

4.4 Legionella found in samples which have more than 100 CFU/litre is immediately escalated to the Responsible Person(s) (Water) who will then inform the Trust Infection Control Team, Health and Safety Manager and Head of Estates by telephone or email, and appropriate remedial action (i.e. isolation of areas, chlorination) is to be taken with onward monitoring and communication to affected personnel instigated. An immediate commencement of increased flushing and revised PPM Schedule for the affected area is to be instigated and records kept.

4.5 **Record Keeping.** To ensure that precautions continue to be carried out and that adequate information is available for checking what is done in practice, a record should be kept and maintained for at least five years showing the information specified in the Approved Code of Practice (ACOP).

4.6 Precautionary measures and treatments, monitoring results and remedial work should be logged and signed or initialled by the person who has carried out the work. Sufficient information should be recorded to show what measures have been taken and how they have been monitored.

4.7 A compliance Log-Book system is to improve the efficiency and effectiveness of installation and maintenance, and also to provide a record of various tasks and observations so that the plant history can be reviewed at any time by maintenance staff. It will prove essential to the maintenance engineer in the operation of a planned plant maintenance scheme, and, if properly followed, will prevent unacceptable conditions developing as a result of ineffective maintenance.

4.8 The Compliance Log-Book system will:

- Identify the Responsible Person (Water), Deputy Responsible Person (Water).
- Identify the installation requiring attention and how it operates.
- Record results of the initial commissioning (if available) and any decommissioning so that observations made during maintenance checks can be compared.
- Define the maintenance task or observation required and the frequency.
- Provide for the recording of maintenance observations and results and for comments to be made in respect of any defect seen during the inspection. This facility should exist for each item of plant individually and for overall system observations.
- Provide dates and results of inspections, tests and all associated works and procedures.

These entries should be kept available for inspection for at least five years from completion.

4.9 The user's needs must be considered before commencing any operational or maintenance tasks and the timing for these tasks must be considered and carefully planned in order to minimise inconvenience. Appendix 4 has a poster that can be printed and put up to indicate if a water outlet has been identified as being low use on the site.

4.10 Adequate records of actions, and amended water service schematic diagrams shall be produced by the Estates maintenance department showing the relevant modifications and disconnections made to the water systems. The amended schematic diagrams must be retained and uploaded to the Internet Property Register (IPR) elements of MICAD and all associated documentation retained for record keeping purposes.

5. PROCEDURES for CLOSURE (PERMANENT or TEMPORARY) of an AREA and RE-OCCUPANCY of a PREVIOUSLY CLOSED AREA

5.1 **Background.** Where part or all of a building is going to close for a period of greater than one week, the relevant manager must notify the Responsible Person (Water) of the details. Following a closure decision, negotiations between the relevant manager and the Responsible Person (Water) must take place to ensure that the following procedure(s) are established and documented, and to clearly define what actions named individuals shall perform.

5.2 **Period of Closure.** The period of closure should be established at the earliest point in negotiations. The period for which an area is closed can play an important part on the cost implication and scale of works involved in a closure.

5.3 **Partial Closure.** Where a partial closure is expected or identified the procedures identified in Paragraphs 5.4 to 5.5 and 5.11 to 5.13 (inclusive) should be followed.

5.4 **Temporary Closure.** Where a closure is expected to not exceed 60 days a weekly Planned Preventative Maintenance (PPM) schedule will be implemented by Estates maintenance to run every tap for 3 minutes and flush every toilet twice weekly. The nominated individual should then complete the record sheet, signed by themselves and their relevant manager, the completed form being forwarded to the Responsible Person (Water).

5.5 Before the closed area is re-occupied the Estates maintenance department shall carry out an inspection and test of the water systems and report its condition to the Responsible Person (Water) for any remedial works that may be required.

5.6 It is the responsibility of the relevant manager to notify the Estates Department of their intention to re-open a temporarily closed area using the notification at Appendix 3.

5.7 **Indefinite Closure.** In the instance that part or all of a building is to close with no planned re-opening date, or where the closure period exceeds 60 days, negotiations must be held as detailed in Paragraph 5.1, and funding made available to the Estates Department (by the manager of the department that is closing), in order to disconnect and drain the water services within the affected area. The relevant manager should be aware that considerable cost for modifications could be needed to achieve this requirement in some large properties.

5.8 **Detail of Works for an Indefinite Closure.** Where relevant, all water tanks associated with the affected area shall be drained, cleaned and dried out. All pipe work and devices shall be drained and where applicable domestic hot water calorifiers (or storage vessels) shall be opened up, cleaned and left open to the atmosphere. Pipe work shall be disconnected from the mains services and capped off, mains cold water services shall be isolated and capped off from the system and all relevant pipes drained.

5.9 Notices shall be posted throughout the affected area stating that all water services are disconnected.

5.10 The Estates maintenance department shall be responsible for ensuring that an adequate water seal exists in unused toilets to prevent odours from the foul drain system entering the premises.

5.11 **Re-occupation of an Indefinitely Closed Area.** In the event of re-occupation of an indefinitely closed area, full negotiations must take place between the relevant manager and the Estates Department prior to the re-occupation exercise.

5.12 The Estates Department will require the following information:

- The planned re-opening date.
- Any proposed changes of use of the area
- Any areas which will not be used.

The Estates Department will provide the relevant manager with a cost to put the water systems (for which the relevant manager must provide funding) back in service.

5.13 Before the water system is put back into service, any necessary modifications and maintenance shall be carried out prior to the cleaning of the system. Additionally the actions required in Paragraph 5.12 must also be followed.

6. DETECTION AND CONTROL OF AN OUTBREAK OF LEGIONELLA

6.1 **Definition of an outbreak.** A legionella outbreak is defined by the Health Protection Agency as two or more confirmed cases of Legionellosis occurring in the same locality within a six month period. Location is defined in terms of the geographical proximity of the cases and requires a degree of judgement.

6.2 **Detection of an Outbreak.** An outbreak may be detected by a variety of routes and personnel. Estates, Clinical, Infection Prevention and Control, Microbiology and Public Health

6.3 Any person, whatever their profession, should contact the local Infection Prevention and Control Team immediately, if they suspect that an outbreak of Legionella infection may be occurring within the Trust.

6.4 In the case of a suspected outbreak or confirmed case of Legionnaires the water safety meeting will be convened to form an action plan/ tracking sheet (refer to Appendix 7) to control the problem, this meeting will include Infection Prevention and Control, Health Safety Manager, Compliance Officer, Responsible Person(s) Legionella, Estates representative. The water safety meeting will kept informed daily via the tracking sheet that will be completed by the named responsible person identified on the tracking sheet until completion

6.5 The Infection Prevention and Control Team and/ or Responsible Person(s) Legionella will advise in consultation with the manager of the area actions to be taken and will be used as a gateway for daily communication.

6.6 It should be noted that when determining whether an outbreak of legionella infection is occurring, cases may not be confined to patients but may also occur in visitors and staff.

7. TRAINING & COMPETENCY

7.1 Training needs vary depending on the responsibilities and job function; all new staff are made aware of the dangers of Legionella and the level of training they require, dependant on role during the induction process.

7.2 The appointed service provider for Estate maintenance are to provide legionellosis risk management training to its staff, appropriate to the responsibilities of each staff member.

7.3 Once training has been undertaken certificates of training issued and training records are to be updated and held by the Estates maintenance provider for inspection by the Trust Representative(s) as required.

7.4 The Appointed Responsible Person(s) (Water) will report on training attendance figures at the regular contract monitoring meetings.

7.5 Competence is a product of sufficient training, experience and knowledge. Those who undergo Legionella training receive sufficient information and instruction for them to execute the tasks they undertake in a safe and technically competent manner. The effectiveness of this training and the actions of the staff are reviewed through the records they generate and system risk

assessments, these records are reviewed by the appointed Responsible Person(s) (Water) who will address non compliances.

8. MONITORING COMPLIANCE

8.1 The Approved Code of Practice states that the risk from exposure to legionella should be prevented or controlled and that the precautions taken should be monitored to ensure that they remain effective.

8.2 As part of the Estates maintenance specification, water surveys and inspections will be conducted for all water systems in all premises as part of the Planned Preventative Maintenance (PPM) Schedule and all remedial works identified must be actioned.

8.3 Random water sampling should also be conducted as part of this routine.

8.4 Water risk assessments, survey and sampling must be conducted on completion of major refurbishment works and prior to re-occupancy of a previously closed area. The PPM Schedule should then be established for this area.

8.5 As part of the ongoing Service Level Agreement monitoring, records will be checked to ensure that PPM schedules, follow-up actions, sampling and surveys are being conducted.

8.6 In order to provide a level of assurance the Responsible Person(s) (Water) will produce quarterly assurance reports that all water survey/inspections have been carried out and any risks have been identified for Legionella to the Trust. In addition an annual report identifying action plans for legionella management and the associated expenditure.

9. EQUALITY & DIVERSITY AND MENTAL CAPACITY ACT

9.1 A thorough and systematic assessment of this policy has been undertaken in accordance with the Trust's Policy on Equality and Human Rights.

9.2 An Equality Impact Assessment has been completed and there are no concerns relating to the equality agenda. See Appendix 1.

10. REVIEW

10.1 This document may be reviewed at any time at the request of either staff or management, but will automatically be reviewed 3 years from initial approval and thereafter on a triennial basis unless organisational changes, legislation, guidance or non-compliance prompt an earlier review.

11. REFERENCES

- Legionnaires Disease – Control of Legionella Bacteria in Water Systems – Approved Code of Practice and Guidance (L8-Fourth Edition 2013) as amended
- Legionnaires Disease – A Guide for Employers (HSE) 2004 as amended
- Health and Safety at Work Etc. Act (HASAWA) 1974 (Sections 2,3,4)
- Reporting Incidents Diseases Dangerous Occurrences Regulations (RIDDOR) as amended
- The Water Act 2003
- Control of Substances Hazardous to Health Regulations (COSHH) 2002 as amended

- Health Protection Regulations 2010 as amended
- Water Supply (Water Quality) (England & Wales) Regulations 2000 as amended
- Water Supply (Water Fittings) Regulations 1999 as amended
- Notification of Cooling Towers and Evaporative Condensers Regulations 1992 as amended
- The Control of Legionella, hygiene, 'safe' hot water, cold water and drinking water systems HTM 04-01 Part A (Design Installation and Testing) and Part B (Operational Management) as amended
- Safe Hot Water and Surface Temperatures – NHS Health Guidance Note 1998 as amended
- Management of Health & Safety at Work Regulations (2002) as amended
- Infection Control in the Built Environment (HBN 00-09) March 2013 as amended
- Health and Safety in Care Homes (HSE HS(G)220) 2001 as amended
- BS EN 806-5:2012 Specification for installations inside buildings conveying water for human consumption. Operation and Maintenance as amended
- BS1710-1984 Specification for identification of pipeline services as amended
- Food Safety Act 1990
- Heating and ventilation systems HTM 03-01: Specialised ventilation for healthcare premises as amended
- Water Management and Water Efficiency HTM 07-04 as amended
- National Health Service Model engineering specification D 08 Thermostatic mixing valves (Healthcare Premises) as amended
- PHLS- Hygiene for hydrotherapy Pools 1992 2nd Edition as amended
- Solent NHS Trust Ward Closure due to a Suspected or Confirmed Outbreak of Infection Policy as amended
- Reporting Adverse Incidents Policy
- Health and Safety Policy

All latest amendments and as referred to in a range of subsequent guidance documents produced by the Health Service Advisory Committee, Health and Safety Executive.

APPENDIX 1

Equality Impact Assessment Completed in consultation

Step 1 – Scoping; identify the policies aims	Answer
1. What are the main aims and objectives of the policy?	This document has been produced in accordance with the general requirements of the Control of Legionella Bacteria in Water Systems (Doc L8) and the Control of Legionella, hygiene, 'safe' hot water, cold water and drinking water systems HTM 04-01 Part A (Design Installation and Testing) and Part B (Operational Management). The policy has been compiled to provide guidance to Directors, Managers, Supervisors and Employees on the arrangements for managing Legionella throughout the Trust
2. Who will be affected by it?	All NHS Trust staff. Independent Contractors.
3. What are the existing performance indicators/measures for this? What are the outcomes you want to achieve?	Local targets Legal requirements Outcomes
4. What information do you already have on the equality impact of this policy?	–
5. Are there demographic changes or trends locally to be considered?	No
6. What other information do you need?	None identified

Step 2 - Assessing the Impact; consider the data and research	Yes	No	Answer (Evidence)
1. Could the policy unlawfully against any group?		✓	
2. Can any group benefit or be excluded?		✓	
3. Can any group be denied fair & equal access to or treatment as a result of this policy?		✓	
4. Can this actively promote good relations with and between different groups?	✓		
5. Have you carried out any consultation internally/externally with relevant individual groups?	✓		Please see routes of consultation and ratification process.
6. Have you used a variety of different methods of consultation/involvement	✓		Consultation within organisation. Please see above.
Mental Capacity Act implications	✓		
7. Will this policy require a decision to be made by or about a service user? (Refer to the Mental Capacity Act policy for further information)		✓	

If there is no negative impact – end the Impact Assessment here.

<u>Step 3 - Recommendations and Action Plans</u>	Answer
1. Is the impact low, medium or high?	
2. What action/modification needs to be taken to minimise or eliminate the negative impact?	
3. Are there likely to be different outcomes with any modifications? Explain these?	

<u>Step 4- Implementation, Monitoring and Review</u>	Answer
1. What are the implementation and monitoring arrangements, including timescales?	
2. Who within the Department/Team will be responsible for monitoring and regular review of the policy?	

<u>Step 5 - Publishing the Results</u>	Answer
How will the results of this assessment be published and where? (It is essential that there is documented evidence of why decisions were made).	



THIS WATER OUTLET HAS BEEN IDENTIFIED AS BEING A LOW USE SITE.

THIS OUTLET MUST BE FLUSHED FOR AT LEAST 3 MINUTES THREE TIMES EACH WEEK.

A RECORD MUST BE KEPT AS EVIDENCE OF FLUSHING IN THE COMPLIANCE LOG BOOK.

Contact the Infection Prevention and Control Team if further advice is needed.

Estates and Facilities – Water Services Notification Form

Building: {insert building name}

Ward/Area: {insert the ward/area name}

Point of Contact: {insert name}

Telephone Number: {Insert Point of Contact’s telephone number}

In accordance with current Trust Policy, I wish to advise the Estates and Facilities Team and their appointed maintenance contractor(s), that the following has been identified/requested and could affect the water system in the above building/area:

...{Insert details e.g. Building being vacated}.....
.....
.....
.....
.....

The planned start date is: {Insert date}

The planned end date is: {Insert end date, or N/A – as applicable}

The following table should be completed, at the initial stages of consultation, to establish all the actions that are required to ensure that water services are maintained and any risks highlighted.

Action Required	By Whom	Date to be completed by

Copies of this form should be held by the Estates maintenance contractor and within the building log-book for future reference. Additional copies should be forwarded to the Trust Estates and Facilities Team.

To:
From:
Date:

Re: NOMINATION OF RESPONSIBILITY FOR THE CONTROL OF LEGIONELLA BACTERIA IN WATER SYSTEMS AND PSEUDOMONAS AUREGINOSA ASSURANCE POLICY

I nominate **(Name and Title)** as the "Responsible Person" for the Management & Control of Legionnaires' Disease and Safe Hot Water Management for all the buildings currently occupied, owned and maintained by the Trust (under a full maintenance lease or otherwise). The responsibilities of this nominated position include:

- i. Overall Responsibility for the Implementation of the Legionellosis Management & Control and Safe Hot Water Management Programmes, across the Trust.
- ii. Supervise the Deputy Responsible Persons.
- iii. Ensure that the delegated Deputy Responsible Persons have received the necessary training as it affects their duties.
- iv. Have Overall Responsibility for Auditing the Legionella Management & Control Programmes across the Trust, and reporting all findings to the "Infection Control Team, Compliance Officer, Health and Safety Manager, Head of Estates".
- v. Advise the Deputy Responsible Persons on all matters relating to the Management & Control of Legionnaires' Disease and ensure that they are informed of all changes, or proposed changes, in the legislation/recommendations relating to Legionella which may affect the Trust, in general, and the buildings under their control, specifically.
- vi. Carry out suitable and sufficient Risk Assessments to identify the Risk of Legionella and/or Scalding on all buildings under their control and review these assessments on, at least, a two-yearly basis or when there have been major alterations to a system.
- vii. Consider each Risk Assessment Report and ensure the design, arrangement, implementation and management of all necessary Remedial Works required to allow the systems to comply with the current and relevant guidelines and legislation, and to ensure minimisation or control of the prevailing risk.
- viii. Ensure that all new or significantly altered water systems are properly Risk Assessed and ensure that, where appropriate, such systems are included in the Legionella Management Programme.
- ix. Assess the training needs for training of staff involved in the Legionella Management Programme and liaise between suitable training establishments, Consultants to provide approved Training Courses.
- x. Ensure personal training records are kept up to date.

I accept this nominated position and I undertake to implement all specified requirements as described in the Trust's "CONTROL OF LEGIONELLA BACTERIA IN WATER SYSTEMS AND PSEUDOMONAS AUREGINOSA ASSURANCE POLICY".

Signature:
(Name and Title)
Date:

To:
From:
Date:

Re: NOMINATION OF RESPONSIBILITY FOR THE CONTROL OF LEGIONELLA BACTERIA IN WATER SYSTEMS AND PSEUDOMONAS AUREGINOSA ASSURANCE POLICY

I nominate **(Name and Title)** as the "Deputy Responsible Person" for the Management & Control of Legionnaires' Disease for all of the properties currently occupied, owned and maintained by the Trust (under a full maintenance lease or otherwise).

The responsibilities of this nominated position include:

Responsibility for the Operational Management of the Legionellosis Management & Water Management PPM Programme, across the buildings under their control as described in – Method of Operation of the PPM Programme of the Control of Legionella Bacteria in Water Systems .

ii. Implement, maintain and manage a Log-Book system which operates a "Defect-Log" (and retain all data for five years).

iii. Consider the Log-Book and Defect-Log, pertaining to each building/system, and ensure the design, arrangement, implementation and management of all Pre-Planned Maintenance Programmes required to allow the systems to comply with the current and relevant guidelines and legislation, and to ensure minimisation or control of the prevailing risk.

iv. Advise the Trust Responsible Person, the status of the Legionella Management Programme within the buildings under their control.

v. Regularly audit the locally implemented Legionella Management Programme".

I accept this nominated position and I undertake to implement all specified requirements as described in the Trust's "CONTROL OF LEGIONELLA BACTERIA IN WATER SYSTEMS AND PSEUDOMONAS AUREGINOSA ASSURANCE POLICY".

Signature:

(Name & Title)

Date:

To:
From:
Date:

Re: NOMINATION OF A CONTRACT SUPERVISING OFFICER RESPONSIBILITY FOR EXTERNALLY VERIFYING THE CONTROL OF LEGIONELLA BACTERIA IN WATER SYSTEMS AND PSEUDOMONAS AUREGINOSA ASSURANCE POLICY

I nominate **(Name and Title)** as the "**CONTRACT SUPERVISING OFFICER** " to externally verify that the Management & Control of Legionnaires ' Disease for all of the properties currently occupied, owned and maintained by the Trust (under a full maintenance lease or otherwise).

The responsibilities of this nominated position include:

They will verify that the Responsible Person responsibilities for the Operational Management of the Legionellosis Management & Water Management PPM Programme, across the buildings under their control are being suitably managed.

They will witness tests and checks under the terms of the contract between Solent and the Hard FM Estates provider

Regularly audit the Legionella Management Programme

Advise the Responsible Person, on the status of the Legionella Management Programme within the buildings under their control.

I accept this nominated position and I undertake to implement all specified requirements as described in the Trust's "CONTROL OF LEGIONELLA BACTERIA IN WATER SYSTEMS AND PSEUDOMONAS AUREGINOSA ASSURANCE POLICY".I confirm that I have specialist knowledge, training and experience of hot and cold water supply, storage and mains services

.

Signature:

(Name & Title)

Date:

Legionella Outbreak Action Plan/ Tracking Sheet					Solent  NHS Trust
Date	Description and location of Incident	Action plan/ Recommendations	Responsible Person	Daily Progress update	Action on going/ Completed