

DOCUMENT CONTROL	
Title:	Legionella Policy
Version:	2
Reference Number:	CO113
Scope:	
This policy applies to everyone working for, or on behalf of, the Trust, and those with responsibility to manage water systems.	
Purpose:	
The purpose of this document is to ensure that the Trust has robust systems and processes to provide wholesome water and to minimise the risk of water contamination.	
Requirement for Policy	
Recommended by the Health Tech Memorandum 04-01	
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Full re-write to reflect legislation and day to day management of water distribution. Added to new template.	
Owner:	
Estate Operations Engineer – Warren Duffy	
Individual(s) & group(s) involved in the Development:	
This document has been developed in collaboration with the following interested parties: <ul style="list-style-type: none"> • Estates Department • Infection Prevention & Control • Health and Safety 	
Individual(s) & group(s) involved in the Consultation:	
The document has been circulated for consultation and comments have been taken into consideration and the document amended accordingly: <ul style="list-style-type: none"> • Estates Department • Infection Prevention & Control • Health and Safety Department 	

Equality Impact Analysis:	
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Review:	
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Responsibility of:	Estate Operations Engineer
Other Trust documentation to which this policy relates (and when appropriate should be read in conjunction with):	
	Legionella Operational Management & Written schemes
Policy Associated Documents:	

Other external documentation/resources to which this policy relates:	
	Health Technical Memorandum 04-01: The control of Legionella, hygiene, “safe” hot water, cold water and drinking water systems.
	Legionnaires’ disease. The control of Legionella bacteria in water systems. Health and Safety Executive Approved Code of Practice L8 (2013)
	BS8580:2010 – Water quality – Risk assessments for Legionella control – Code of Practice
	PD 855468:2015 – Guide to the flushing and disinfection of services supplying water for domestic use within buildings and their curtilages.
CQC Regulations	
This policy supports the following CQC regulations:	
Regulation 12	Safe care and treatment

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1. INTRODUCTION

Legionella bacteria can be found naturally in environmental water sources such as rivers, lakes and reservoirs. Consequently, they may commonly be found in purpose built water systems that may include Notifiable Devices such as cooling towers, evaporative condensers and whirlpool spas.

Where conditions allow the bacteria may multiply to levels that present an increased risk of contracting Legionnaires' disease.

Legionnaires' disease is a form of pneumonia that primarily affects people who are susceptible because of age, pre-existing illness, immunosuppression, smoking etc. Infection is attributed to inhaling the aerosolised water containing legionella bacteria.

The Trust has a duty to identify and assess all potential risks and implement precautions to minimise any identified risks as part of an effective management regime with appropriate records being maintained.

Legionella contamination risk can be assessed and controlled by maintaining prevention measures as outlined in the external documents found on the front page.

2. POLICY STATEMENT

Pennine Care NHS Foundation Trust recognises a duty to take all reasonable measures necessary to prevent the exposure of patients, visitors, staff and the local communities to risks associated with contaminated water systems.

The Trust will provide a robust management system is in place to identify, assess, document and control all potential hazards related to water distribution systems in conformity with current legislation.

3. RESPONSIBILITIES, ACCOUNTABILITIES AND DUTIES

3.1 The Chief Executive (Duty Holder)

The Chief Executive is the organisations statutory duty holder and has the overall responsibility for ensuring that effective arrangements for the management of the control of opportunistic water borne pathogens are put in place.

3.2 The Director of Capital Investment & Estates Services

The Director of Capital Investment & Estates Services is responsible for appointing an appropriately trained, experienced and competent Responsible Person (RP) for the control of Legionella bacteria in water distribution systems. The appointment should be confirmed in writing to the appointed Responsible Person (RP) and incorporated as part of the Trust organisational structure.

3.3 Head of Estates Operations

The Estates Operations Manager is responsible for carrying out all obligations regarding the management of this policy and its associated water hygiene regimes.

3.4 The Head of Capital & Design

The Head of Capital & Design is responsible for carrying out all obligations regarding the management of this policy and its associated water hygiene regimes and in particular at handover stages of Capital Projects. It is recommended that all such project work conform with PD855468:2015.

3.5 Responsible Person (Legionella)

The Director of Capital Investments & Estates Services will appoint from within the estates operational management team an RP (Legionella) and a deputy, confirming the appointments in writing.

The RP is responsible for ensuring that water hygiene regimes are maintained in accordance with the current guidance.

The RP shall possess adequate professional knowledge and appropriate training to manage carry out the roles and responsibilities.

3.6 Deputy Responsible Person

The RP is to appoint a deputy (DRP) to who delegated roles and responsibilities may be given. The deputy shall act for the RP on all occasions when they are unavailable.

3.7 Infection Prevention and Control Team

Infection Prevention and Control Team are the persons nominated by management to advise on Infection Control policies and the challenges in regards minimising the Infection control risks to staff and patients.

The infection Prevention and Control (IP&C) Team are the persons nominated by management to advise on Infection Control IP&C policies and the challenges in regards minimising the Infection control risks to staff and patients. They will assist with the prioritisation of water systems risk assessments for inclusion on the Trust's risk register. They will be part of the outbreak control team and provide/obtain professional advice and will be part of the Water Safety Group that review the operational procedures and recommend changes in line with current practice.

3.8 Competent Persons

The Competent Persons are responsible for the day to day written schemes, maintenance and monitoring of water hygiene regimes.

They are also responsible for ensuring that all maintenance staff are trained and competent to work on the Trusts water distribution systems.

3.9 Departmental Managers (Ward Managers)

Departmental Managers are responsible for informing Estates, including the IPC Team, of any changes to the water distribution systems that may impact on the water quality.

3.10 Contractors

The Trust will only use contractors for working on water distribution systems, as approved by the RP. The contractors must adhere to the Trust Legionella Policy (Water Safety) and the Contractors on site Policy.

A contractor is the person or organisation designated by the Trust to be responsible for the supply, installation, validation and/or verification of hot and cold water services. A contractor must also be able to conduct all relevant installation checks and tests. In relation to the control of Legionella, it is essential to ensure that potential contractors have suitable qualifications and evidenced competencies.

The Contractors must adhere to the CO113 Legionella Policy and CO25 Contractors on Site policy.

3.11 Employees of the Trust

All members of staff have a responsibility to comply with the requirements of this policy and associated procedures. Staff must report any defects to managers that may lead to increased risks of patients contracting an infection and assist in the prioritisation of risks. Employees, patients, visitors and the general public using Trust premises, adjacent buildings and thoroughfares may be at risk from the following water using devices that are installed or used on Trust sites. Areas of risk where control is necessary are:

- Showers
- Spray mixer taps
- Domestic hot water systems
- Tank fed cold water systems
- Infrequently used outlets
- Drinking water distribution
- Humidifiers and air conditioner units
- Ornamental water fountains
- Installation of new and alterations to existing systems.
- Pressure washers
- Plant watering systems
- Cool drinking chambers
- Dish washers
- Dental equipment
- Any other water using equipment that may produce aerosol sprays or mists.

4. RISK ASSESSMENT

The Risk Assessment will be carried out by an external independent contractor who can demonstrate competence and experience.

The overall risk rating for a water distribution system will be calculated on a Scoring Matrix which considers the following factors as outlined in BS8580:2010

- Contamination
- Amplification
- Transmission
- Exposure
- Host Susceptibility

Risk control measures will be documented in the Legionella Management and control Procedures Document maintained by the Estates Maintenance & Operations Department.

This Procedures Document identifies specific water management tasks to be completed and details the PPM required. The frequency of these tasks are pre-set and automatically generated by the Estates Operations Department work management system (Planet FM).

5. RECORDS

Work completed by maintenance staff and/or contractors is recorded on the Planet FM and Aqua Adept Software systems. These systems, as well as hard copies, are kept for a minimum of 5 years.

6. WRITTEN SCHEMES

All Legionella Control Procedures are recorded in the Legionella Operational Management and Written Schemes document which supports this policy. Written Schemes are all day to day water hygiene regime conformity tasks. These conformity tasks will be regularly assessed for relevance and effectiveness by the Trusts Water Safety Group.

7. TRAINING

All Estates Staff will be trained and made aware of the potential threat of Legionella bacteria contaminating the water distribution systems and those who work on specific equipment will be given relevant training. Members of staff from other departments will have opportunity to be part of the training sessions.

The Trust shall:

- Keep all records of training on a bespoke training register
- Provide adequate training as per individual needs and to carry out the requirement of the written schemes and statutory obligations
- Will Comply with the Trust Legionella Policy and Legionella Operational Management & Written Schemes

8. EQUALITY IMPACT ANALYSIS

As part of its development, this document was analysed to consider / challenge and address any detrimental impact the policy may have on individuals and or groups protected by the Equality Act 2010. This analysis has been undertaken and recorded using the Trust's analysis tool, and appropriate measures will be taken to remove barriers and advance equality of opportunity in the delivery of this policy / procedure

9. FREEDOM OF INFORMATION EXEMPTION ASSESSMENT

Under the Freedom of Information Act (2000) we are obliged to publish our policies on the Trust's website, unless an exemption from disclosure applies. As part of its development, this policy was assessed to establish if it was suitable for publication under this legislation. The assessment aims to establish if disclosure of the policy could cause prejudice or harm

to the Trust, or its staff, patients, or partners. This assessment has been undertaken using the Trust's Freedom of Information Exemption Guide, and will be reviewed upon each policy review.

10. INFORMATION GOVERNANCE ASSESSMENT

This Policy has been analysed to ensure it is compliant with relevant information law and standards as in place at the time of approval, and are consistent with the Trust's interpretation and implementation of information governance components such as data protection, confidentiality, consent, information risk, and records management.

Compliance will be reviewed against any changes to legislation / standards or at the next review of this document.

11. SAFEGUARDING

All staff has a responsibility to promote the welfare of any child, young person or vulnerable adult they come into contact with and in cases where there are safeguarding concerns, to act upon them and protect the individual from harm.

All staff should refer any safeguarding issues to their manager and escalate accordingly in line with the Trust Safeguarding Families Policy and Local Safeguarding Children/Adult Board processes.

12. MONITORING

The effective application of this policy, including adherence to any standards identified within will be subject to monitoring using an appropriate methodology and design, such as clinical audit.

Monitoring will take place on a biannual basis and will be reportable to the Quality Group via the Clinical Effectiveness and Quality Improvement Team.

13. REVIEW

This policy will be reviewed regularly by the Water Safety Group, whilst ensuring that the review period does not exceed two years.

14. REFERENCES

- Legionella Operational Management & Written Schemes - (found on Trust G: Drive) or ask the Estates Department for access if request is appropriate.