



LEGIONELLA MANAGEMENT POLICY

1.0 Introduction

Reynaers Aluminium Ltd recognises that it has a duty of care to employees, visitors and the general public that may be affected by the operation and maintenance of premises by the organisation.

To ensure that the highest reasonably practical standards are maintained throughout the organisation all directives issued by the Health & safety Executive, Department of Health and the British Standards Institution relating to prevention and control of Legionella will be adopted where relevant.

The Company will therefore ensure that sufficient resource is made available to ensure that water storage and distribution systems are operated and maintained in accordance with current legislation and guidance and shall take all reasonably practicable steps to ensure risk of Legionella proliferation and contamination is minimised.

Legislation governing the control of legionella bacteria has been introduced via a series of regulations made under the enabling act, The Health and Safety and Work etc. Act 1974.

The principle of this act is to assess hazards and risks and then take precautions to minimise this risk.

2.0 Scope

This policy covers the management and control of Legionella and other contaminants in water systems within the premises.

3.0 Responsibility

The Company will appoint a responsible person, Steve Hubbard, to ensure that the commitments in this policy are carried out as well as the actions identified in the risk assessments,

See Management structure below:

Management Structure:

DUTY HOLDER: Peter Burke

The control and management of Legionella in hot and cold water systems is a corporate responsibility. The Approved Code of Practice (ACoP L8), The Control of Legionella Bacteria in water systems allows the Duty Holder to obtain assistance from a competent contractor.

- **RESPONSIBLE PERSON:** Steve Hubbard. Primary objective will be to have day to day responsibility for controlling any identifies risk from legionella bacteria and ensure that all water systems are fully compliant with all aspects of Legionella legislation

4.0 Legionnaires Disease

Legionnaires' disease is a potentially fatal form of pneumonia which can affect anybody, but which principally affects those who are susceptible because of age, illness, immunosuppression, smoking etc. Illness caused by the bacterium; *Legionella pneumophila* and related bacteria. Legionella bacteria can also cause less serious illness which are not fatal. The collective term used to cover the group of diseases caused by the legionella bacteria is *Legionellosis*.

The disease is normally contracted by inhaling Legionella bacteria, either in tiny droplets of water in the form of aerosols or in droplet nuclei which are particles left after the water has evaporated and are contaminated with Legionella, deep into the lungs. Incubation period is between 2-10 days and not everyone who is exposed will develop symptoms of the disease.

The disease is usually diagnosed by a combination of tests. The organism may be cultured from the patients' sputum, bronchial washings or lung tissue. Alternatively, tests are used to measure the presence of antibodies in the blood and, increasingly, tests are available to measure specific antigens in the urine.

5.0 Assessment of Risk

5.1 The Risk Assessment

The ACoP L8 requires that a suitable and sufficient assessment is required for each premises and water system under the responsibility of the Company in order to identify and assess the risk of exposure to legionella bacteria.

The assessment should follow the requirements of BS 8580-1:2019 and HSG274 Parts 1-3. Where there is a risk, the significant findings of the assessment will be recorded.

Therefore a suitable and sufficient assessment to identify the potential risk of legionellosis being contracted from the water system within the building shall be carried out by a competent person appointed by the Duty Holder.

The risk assessment shall be made available for building users to refer to by issuing a hard copy on site. The risk assessment will form the basis of the water monitoring regime for that property.

The competent person(s) will have to:

- understand the requirements of relevant statutory legislation that applies to that area being assessed,
- be able to identify hazards and assess the risks inherent in water services,
- be able to identify steps necessary to control any risk identified as far as is reasonably practicable.

All assessments shall identify and evaluate potential sources of risk and:

- the particular means by which exposure to legionella pneumophilla is to be prevented, or
- if prevention is not reasonably practicable, the particular means by which the risk is to be minimised.

All systems susceptible to colonisation by Legionella and which incorporate a potential means for creating and disseminating water droplets shall be identified and the risks they present addressed.

Risk shall be assessed not just for the routine operation or use of the system, but also in relation to maintenance, breakdown, abnormal operation, commissioning or unusual circumstances.

The assessment shall take account of the:

- the potential for droplet formation
- water temperature
- the likely risk to those who will inhale water droplets
- means of preventing or controlling the risk
- materials in the system that can harbour or provide nutrient for bacteria and other organisms



LEGIONELLA MANAGEMENT POLICY

Where the assessment demonstrates that there is no reasonably foreseeable risk, or that risks are insignificant and unlikely to increase, no further measures are necessary.

Where the assessment shows that there is a reasonably foreseeable risk, the Company shall ensure a scheme is adhered to that will minimise the risk.

5.2 Water Temperatures

Temperature will be used as the primary means for controlling legionella bacteria, hot water is to be stored at 60°C or above at all times and distributed to all outlets at temperatures above 50°C within one minute of flow.

Where temperature is found to be insufficient to control fully legionella proliferation, the risk assessment may recommend the use of supplementary means of control, chlorine dioxide or other biocides may be considered in these instances.

All risk assessments shall be reviewed with, and ratified by, the Duty Holder and Responsible Person who shall:

- ensure that all proposed actions have been correctly prioritised; and
- set out and agree deadlines for the completion of each level of priority with those responsible for implementing the actions

A copy of the Risk Assessment is available to all those responsible for Implementing the control measures identified. An electronic copy will be kept on our Y:\Public\Operations\OPERATIONS\HEALTH & SAFETY\Legionella\Risk Assessment

5.3 Management Control of Risk

All serious defects (emergency status) noted during visible inspections or as a result of a scheduled PPM service of Legionella susceptible water systems, shall be reported immediately to the Duty Holder and Responsible Person who shall ensure that all necessary remedial action is implemented as soon as is reasonable practicable.

On completion of the Risk Assessment, a maintenance plan will be formulated by the specialist Contractor and the Responsible Person within Reynaers Aluminium Ltd.

The Responsible Person will monitor the maintenance plan and receive monthly updates on the completion of each agreed action. In addition, a Legionella Working Core Team,

5.4 Emergency Plan

As part of the investigation and control of any outbreak, the Company must assist and comply with the requests and recommendations given by the relevant enforcing authority. Such requests and recommendations may include:

1. To shut down any processes which are capable of generating and disseminating airborne water droplets and keep them shut down until sampling procedures and any remedial cleaning or other work has been done. Final clearance to restart the system may be required.
2. To take water samples from the system before any emergency disinfection being undertaken. This will help the investigation of the cause of the illness. The investigating officers from the local authority may take samples or require them to be taken.
3. To provide staff health records to discern whether there are any further undiagnosed cases of illness and to help prepare case histories of the persons affected.
4. To co-operate fully in an investigation of any plant that may be suspected of being involved in the cause of the outbreak.
 - a) Tracing of all pipework runs;
 - b) Detailed scrutiny of all operational records;
 - c) Statements from relevant employees.
 - d) Statements from water treatment contractors or consultants.

In addition, the Company must chemically and or thermally disinfect any system which has been implicated in the outbreak; disinfection must follow the process of thermal / chemical disinfection of hot and cold-water systems as described in L8 and HSG274. The Company nominated water treatment contractor will perform this task

5.5 Record Keeping

All monthly monitoring data will be stored electronically. Access to the system will be available to the Duty Holder, the Responsible Person and other nominated persons

6. Training

All staff involved in legionella management will be provided with adequate training to allow them to undertake their duties effectively.

7. Review

This Management Plan will be reviewed regularly or when legislation changes on a regular basis or if there is reason to suspect that it is no longer valid. This will be undertaken by the Responsible Person in conjunction with other members of management.

A handwritten signature in black ink, appearing to read 'R. Hall', written in a cursive style.

Richard Hall
Managing Director