1.0 Introduction

The University recognises its statutory obligations under the Health & Safety at Work Act 1974, The Management of Health & Safety at Work Regulations 1992 and The Control of Substances Hazardous to Health (COSHH) Regulations 2002 to identify and control the risks to students, staff & visitors from exposure to legionella bacteria.


The agent that causes Legionnaires’ disease is a bacterium called *Legionella pneumophila*.

People catch Legionnaires’ disease by inhaling small droplets of water suspended in the air which contain the bacteria.

Certain conditions within water systems increase the risk of legionella proliferation:

- a suitable temperature for growth 20°C to 45°C;
- a source of nutrients for the organism, e.g. sludge, scale, rust, algae, and other organic matter; and
- a way of creating and spreading breathable droplets, e.g. the aerosol created by a cooling tower, showers or spray taps.

This standard outlines systems and procedures to control legionella bacteria within the university’s water systems.

2.0 Purpose

The purpose of this document is to detail the UCL management arrangements to be followed to ensure compliance with its legal duty to control the risk associated with the proliferation of legionella and covers the following:

- Roles and responsibilities
- Records
- Training
- Monitoring & review

3.0 Scope

This document details how UCL will address the issue of Legionella. The University has a duty of care to all Students, Staff and Visitors across its entire Estate and as such, this Policy shall be applicable to all UCL UK buildings, as listed on the UCL Building Register.

The only exception to this is with regards to leasehold buildings, where UCL does not hold the maintenance or repair obligations. In such areas, UCL Responsible Person – Legionella - Operation shall ensure that the Landlord is carrying out such tasks to the same level of conformity and diligence.

Where UCL has members of staff and students using these buildings there is a duty of care to ensure that the duty holder in those buildings has adequate risk assessments in place for controlling the risk of legionella or that UCL completes an assessment for the area under our control.

4.0 Management responsibilities
4.1 Roles and Responsibilities

Denotes a Requirement for the Role Holder to be technically competent with respect to Water Hygiene & Legionella

UCL Council

President & Provost
Duty Holder

Health & Safety Committee
Chair
Vice Provost (Operations)

Director of UCL Estates

Head Engineering, Maintenance & Infrastructure
Duty Holder

Deputy Head of Engineering
Responsible Person
Governance
Legionella

EM&I Responsibilities

Information
EM&I Line Management
Technical Management

EM&I Responsibilities

Responsible Person
Operation
Maintenance Operations Team Leader

Responsible Person
Review
Performance & Compliance Team Leader

Responsible Person
Change
Mechanical Technical Services Team Leader

Competent Person
Water Hygiene Service Providers
UCL Maintenance Staff or Contractor
The Competent Person has the necessary knowledge, training, experience and abilities to carry out the control measures & PPM tasks

Competent Person
Water Hygiene Designers & / or Installers
UCL Staff, Consultant or Contractor
Including Capital Projects Consultants & Contractors
The Competent Person has the necessary knowledge, training, experience and abilities to carry out the Design and / or Installation

The responsible person has been delegated the managerial responsibility for supervising the implementation of this standard and the management of the water systems under the control of UCL in UCL UK Buildings
The principal responsibilities for the management of health and safety are stated in the UCL Safety Policy. Specific responsibilities relating to the management of legionella are stated below.

4.1.1 UCL Council – Duty Holder

UCL Council, as the employer, has the ultimate responsibility for health and safety and is the duty holder for UCL.

UCL Council has delegated the duty of the day-to-day running of UCL, which includes the management of health and safety, to the President and Provost.

4.1.2 The President and Provost

The President and Provost are responsible to UCL Council for the day-to-day running of UCL in all of its activities, including the management of legionella.

The role takes overall responsibility to ensure that the standard for the control of legionella is implemented and that appropriate funding is made available to carry out works.

The Council has constituted the Health & Safety Committee (HSC) to determine a policy framework for health and safety and the executive arrangements therein, which includes the management of legionella.

4.1.3 Health and Safety Committee (HSC)

HSC are responsible to the Council for the planning, consultation and dissemination of the arrangements made within this Legionella Standard and shall maintain details of appointees with responsibilities for the control of legionella and the reporting of relevant information to UCL Estates.

4.1.4 UCL Estates Director

The Director of UCL Estates has responsibility for the strategy and budget allocation for the control of legionella risks at UCL.

The Director of UCL Estates through the Head of Engineering, Maintenance and Infrastructure must appoint in writing a responsible person for the day-to-day management of Legionella Risks.

4.1.5 Head of Engineering, Maintenance & Infrastructure

Line Manager for Deputy Head of Engineering (E, M & I).

- Appoints, in writing, ‘Responsible Persons’ to be responsible for the day-to-day management of UCL’s Water hygiene, Legionella Risks and compliance with current regulations, UCL Policy and SOP.

- Ensures that the Responsible Persons are aware of their roles and responsibilities and that they are competent to carry them out.
4.1.6 Deputy Head of Engineering, (E,M & I) – Responsible Person
Legionella Governance

Has managerial responsibility for managing the governance of legionella risk compliance and providing supervision for implementation of the precautions, on behalf of the Head of E, M & I.

Manages the UCL Policy and SOP for the management of UCL’s Legionella risks and water hygiene, and takes managerial responsibility

The full details, expectations and requirements of this role are contained within the UCL Legionella Standard Operating Procedure, which is controlled by UCL Engineering, Maintenance and Infrastructure. The Standard Operating Procedure forms part of this policy.

4.1.7 Responsible Person - Legionella - Operation

The term ‘Responsible Person’, and the associated duties, applies equally to any nominated Deputy formally appointed to act on all occasions when the nominated Responsible Person is unavailable.

The Responsible Person – Legionella – Operation is a duty holder and has been delegated the primary role to act as administrator in the management of legionella in accordance with the UCL Standards and has managerial responsibility for supervising the implementation of this policy, the standard operating procedure, and the management of the water systems under the control of UCL Estates.

The full details, expectations and requirements of this role are contained within the UCL Legionella Standard Operating Procedure, which is controlled by UCL Engineering, Maintenance and Infrastructure. The Standard Operating Procedure forms part of this policy.

4.1.8 Responsible Person - Legionella - Review

The term ‘Responsible Person’, and the associated duties, applies equally to any nominated Deputy formally appointed to act on all occasions when the nominated Responsible Person is unavailable.

The Responsible Person - Legionella - Review is a duty holder and has been delegated the managerial responsibility for reviewing the compliance and performance against this standard.

The Responsible Person - Legionella - Review produces and develops the policy and standard operating procedures for legionella management on behalf of the Deputy Head of Engineering, and periodically audit their implementation.

The full details, expectations and requirements of this role are contained within the UCL Legionella Standard Operating Procedure, which is controlled by UCL Engineering, Maintenance and Infrastructure. The Standard Operating Procedure forms part of this policy.

4.1.9 Responsible Person - Legionella - Change

The term ‘Responsible Person’, and the associated duties, applies equally to any nominated Deputy formally appointed to act on all occasions when the nominated Responsible Person is unavailable.

The Responsible Person – Legionella – Change is a duty holder and has been delegated the managerial responsibility for supervising the implementation of this standard and the management of any changes,
additions to, or replacements of existing systems, or any new installations to, the water systems under the control of UCL Estates.

The full details, expectations and requirements of this role are contained within the UCL Legionella Standard Operating Procedure, which is controlled by UCL Engineering, Maintenance and Infrastructure. The Standard Operating Procedure forms part of this policy.

4.1.10 UCL Estates

(Projects, Project Managers & University Project Officers)

Project Managers, University Project Officers and the consultants they appoint are responsible for ensuring systems are designed and installed in compliance with the documents contained in the Reference section to this and document, and the UCL Policy and Standard Operating Procedure.

The Responsible Person – Legionella – Change is to approve each stage of the design and acceptance.

The Project Manager and University Project Officer is responsible for ensuring that the water system conditions are maintained throughout the project to include controls such as weekly flushing of unused areas and a chlorination of altered during the works no sooner than ONE week prior to occupancy or reoccupancy.

The Project Manager and University Project Officers will be responsible for ensuring that plant and services are capable of meeting any increased demand where a system is extended and for the provision of as fitted drawings at the time of handover together with all commissioning data.

No system will be accepted unless the Responsible Person – Legionella – Change has given the final written approval.

4.1.11 Contractors (and people appointing contractors)

Those who employ contractors to work on water systems shall be responsible for ensuring the work complies with the requirements of this standard and that the works comply with relevant water regulations and L8.

Reasonable enquiries are to be made to confirm the competency and training of contractors in the area of work, before entering into contracts for the treatment, monitoring, and cleaning of the water system, and other aspects of water treatment and control.

Contractors are to be made fully aware of the duties and responsibilities assigned to them, and are to be familiar with the UCL Standards.

Contractors are to be registered with the Legionella Control Association and that a copy of their registration certificates is held on file.

Only UCL Approved Contractors are permitted to work on UCL water systems.

Contractors are to have completed the necessary UCL Safety Questionnaires and that their responses have been assessed. [Link]

Contractors are to comply with the UCL Safety Policy ‘Safety Rules for Contractors employed on UCL Premises’, and sign the document accordingly.

Work on water systems includes connection to, modification, or maintenance to the water system.
4.1.12 Departments (other than UCL Estates)

Departments are responsible for assessing and controlling the risks from any water systems within their department and departmental equipment, either permanent or temporary, (e.g. experimental rigs), that use water which may present a risk of exposure to legionella bacteria. The assessment should consider whether:

- conditions are right for the bacteria to grow e.g. water is at a suitable temperature (20°C to 45°C) or a source of nutrients e.g. sludge, scale, rust, algae, and other organic matter is available.
- dead legs or dead ends exist.
- the equipment is able to produce small droplets of water as a spray or aerosol which could come into contact with people, especially considering any particularly vulnerable groups of people.

In general the supply of hot and cold water services is the responsibility of UCL Estates, except under some leasehold agreements when a landlord or managing agent will hold this responsibility.

Departments are responsible for reporting the following to the Facilities Customer Services Help Desk stating that the issue is a “legionella risk”:

- any little used outlets, e.g. taps, showers or sluices.
- any taps, showers or sluices that are no longer required.
- when any water system is taken out of use e.g. when a laboratory is to be used as an office space and the sinks are to be retained.

Where there are little used outlets e.g. taps, showers or sluices it will be the department’s responsibility to ensure they are flushed AT LEAST weekly and the activity recorded in compliance with the requirements of L8.

The UCL Estates Facilities department will be responsible for arranging the removal of outlets within all areas that are no longer required.

Water systems and the identification of little used outlets within common areas e.g. toilets will remain the responsibility of UCL Estates Facilities department.

UCL Estates will be responsible for amending the schematic drawings as appropriate, and deciding if the changes warrant the legionella risk assessment to be reviewed.

4.2 Records

Records as shown below must be kept to confirm compliance with this standard and retained for the periods stated.

- The person or persons responsible for conducting the risk assessment, managing, and implementing the written scheme.
- The significant findings of the risk assessment.
- The written scheme and details of its implementation.

These records must be retained throughout the period for which they remain current and for at least two years after that period.

- The results of any monitoring, inspection, test or check carried out, and the dates. This should include details of the state of operation of the system i.e. in use / not in use.
These must be retained for at least five years.

4.3 Training

Legionella awareness training will be provided at 3 levels to suit the different roles of staff:

- management
- technical / maintenance
- refresher training as required

The training for maintenance staff shall ensure that they are made aware of the fittings that can be used and the materials that harbour bacteria and other micro-organisms, or provide nutrients for microbial growth.

Training records / evidence of competence must be provided by contractors.

4.4 Monitoring & Review

The Estates Standard Operating Procedure(s) and Written Schemes detail the procedures for preventing, monitoring and controlling risk. These documents along with this standard shall be annually reviewed to ensure they remain up to date.
5.0 References

- Control of Substances Hazardous to Health Regulations 2002 (COSHH)
- Management of Health and Safety at Work Regulations 1999
- Public Health (Infectious Diseases) Regulations 1988
  *Legionella is a notifiable disease.*
- TM13 Minimising the Risk of Legionnaires Disease 2013
- Water Supply (Water Fittings) Regulations 1999
- Water Supply (Water Quality) Regulations 2000
- Notification of Cooling towers and Evaporative Condensers Regulation 1992
- BS8580 Risk Assessments for Legionella Control 2010
- BS 6700:2006 Design, installation, testing and maintenance of services supplying water for domestic use within buildings and their curtilages. Specification
- Food Safety Act 1990
- UCL Design Brief for Mechanical, Electrical & Vertical Transport Services
- Water Regulations Advisory Scheme - http://www.wras.co.uk/
- HSE Legionnaires’ disease A guide for employers IAC27(rev2) 01/01 C300
- HSE Essential information for providers of residential accommodation INDG376 05/03
Insert Name and Title
University College London
1-19 Torrington Place
London
WC1E 7HB

Insert date

Ref: Insert Reference

Dear Insert First Name,

Responsible Person - Legionella - Operation / Change / Review Delete as appropriate

You are nominated as the Responsible Person - Legionella - Operation / Change / Review delete as appropriate, as specified under the Health and Safety Executive Approved Code of Practice and guidance document L8 ‘Legionnaires’ Disease - The control of legionella bacteria in water systems’ 2013, Fourth Edition, and any subsequent revision.

You must undertake the duties attributed to your role as listed within the enclosed UCL Legionella Standard, Insert reference, and any subsequent revision.

Yours sincerely,

Geoff Prudence
Head of Engineering, Maintenance & Infrastructure
UCL Estates

Cc Personal file
Deputy Head of Engineering, (E,M &I): – Legionella Governance

I accept the appointment detailed above and acknowledge receipt of the UCL Legionella Standard Reference Insert reference

.................................................................................................................. Date:............................
Name & Title
Dear Insert First Name,

Responsible Person - Legionella - Operation / Change / Review Delete as appropriate

The UCL Responsible Person - Legionella - Operation / Change / Review delete as appropriate, is insert name and title

You are the nominated deputy Responsible Person - Legionella - Operation / Change / Review delete as appropriate as specified under the Health and Safety Executive Approved Code of Practice and guidance document L8 ‘Legionnaires’ Disease - The control of legionella bacteria in water systems’ 2013, Fourth Edition, and any subsequent revision.

You should act for the Responsible Person - Legionella Operation / Change / Review Delete as appropriate on all occasions when the responsible person is unavailable.

You must undertake the duties attributed to the Responsible Person - Legionella - Operation / Change / Review delete as appropriate as listed within the enclosed UCL Legionella Standard, Insert reference, and any subsequent revision.

Yours sincerely,

Geoff Prudence
Head of Engineering, Maintenance & Infrastructure
UCL Estates

I accept the appointment detailed above and acknowledge receipt of the UCL Legionella Standard Reference Insert reference

Date:.........................

Name & Title

Safety Services References
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