



LEGIONELLOSIS POLICY



Policy Title

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Section 1 – Policy Intentions

1.1 - It is the policy of Gloucestershire Constabulary and the Office of the Police and Crime Commissioner to recognise that good management of the water systems in all its premises is essential in preventing illness and possibly death from legionellosis in our employees, contractors, visitors, detainees and the general communities in which we operate.

It is our intention that we to comply with all relevant statutory obligations as a minimum standard and to provide such resources, information, training and supervision, as they need for this purpose. Beyond this, we will do everything reasonably practicable to comply with all relevant codes of practice, guidance and established best practice in order to reduce the risk of legionellosis to the lowest practicable level.

This will be judged on the basis of the balance of risk, cost and difficulty.

1.2 - Legionnaires’ disease is a potentially fatal pneumonia caused by legionella bacteria. It is the most well-known and serious form of a group of diseases known as legionellosis. Other similar (but usually less serious) conditions include Pontiac fever and Lochgoilhead fever.

Infection is caused by breathing in small droplets of water contaminated by the bacteria. The disease cannot be passed from one person to another.

Legionella bacteria are common in natural water courses such as rivers and ponds. Since legionella are widespread in the environment, they may contaminate and grow in other water systems such as cooling towers and hot and cold water services.

They survive low temperatures and thrive at temperatures between 20-45°C if the conditions are right, e.g. if a supply of nutrients is present such as rust, sludge, scale, algae and other bacteria. **They are killed by high temperatures.**

The Health and safety at work Act sections 2 and 3 specify the duty of care to employees and non-employees to ensure compliance.

The procedures to deal with legionella, adopted by Gloucestershire Constabulary and the Office of the Police and Crime Commissioner , are primarily based upon the Health and Safety Commission’s Approved Code of Practice, “Legionnaires Disease – The control of Legionella bacteria in water systems” (L8)¹, together with other guidance and standards.

Section 1 – Policy wording

Gloucestershire Constabulary and the Office of Police and Crime Commissioner have had risk assessments carried out by consultants (Pure Group). Each of our premises has been assessed on the risk of exposure to



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bacteria (especially Legionella) from water systems and to identify any further necessary precautionary measures.

Following this, any recommended remedial actions will be completed as appropriate to the risk. All water systems will be maintained to ensure that they are kept clean and disinfected as appropriate and that proper temperatures are achieved.

We will consult with and provide information to employees regarding the risk assessment and control measures that are required. Copies of the risk assessments are available for each site on the Estates 'K Drive'.

The majority of buildings owned or leased by Gloucestershire Constabulary and the Office of Police and Crime Commissioner present a relatively low risk of legionella bacteria as the risk assessments confirm that the only potential risks are associated with showers and the spray taps in the toilet facilities for the disabled. We recognise that we have no cooling towers or evaporative condensers which present the greatest risk.

The risk of contracting legionellosis from sentinel taps has been assessed as insignificant because the taps themselves do not create a respirable mist, the data collected shows that the Constabulary does not have problems with the temperature of the water in the taps and our staff are not generally vulnerable to infection. Whilst the risk is considered to be relatively low, it is essential to ensure that records are available to demonstrate a duty of care and responsibilities pertinent to the legislation. Temperature checks on 'taps' will be conducted at a frequency determined relevant to the risk and use of the building.

It is recognised that detainees may have a lower immunity and therefore the legionellosis risk in the custody suite requires more strict control measures. Each cell will need to be checked on a monthly basis.

If a member of our staff is considered to have low immunity this must be reported to the Estates team so that a risk assessment can be completed. Consultation with HR will be required to determine risk, issues and impact as appropriate.

The HSC approved code of practice, "Legionnaire's Disease – The control of Legionella bacteria in water systems"(L8) states that "where the assessment demonstrates that there is no reasonably foreseeable risk or that risks are insignificant and unlikely to increase, no further assessment or measures are necessary. However, should the situation change, the assessment needs to be reviewed and any necessary changes implemented." Notwithstanding this, in order to demonstrate a duty of care, proportionate checks will be undertaken.

Gloucestershire Constabulary and the Office of Police and Crime Commissioner has a number of procedures for the prevention and control of the risk of exposure.

Section 2 – Procedural guides

Procedure 1 - local controls measures required for buildings with shower facilities and spray taps

Procedure 2 - procedure in the Event of Departmental/Station Closure or building rarely used

Procedure 3 - occupation of New Premises – Safe Operation of Water Systems

Procedure 4 – action in the Event of an Outbreak of Legionellosis

Procedure 5 - procedure for assessing the risk and carrying our remedial actions



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Section 3 - Relevant Legislation: *(Human rights/diversity/Health & Safety/any other specifics)*

Health and Safety at Work etc. Act 1974, Sections 2, 3 and 4 impose duties on employers to ensure so far as is reasonably practicable, the health, safety, and welfare at work of all their employees. They also impose similar duties in respect of persons other than their employees and impose duties on persons in charge of premises.

Management of Health and Safety at Work Regulations 1999, Regulation 3 imposes an absolute duty to carry out risk assessments for all activities.

Control of Substances Hazardous to Health Regulations 2002 applies to all substances hazardous to health, such as Legionella, and requires employers to carry out risk assessments, and if appropriate implement controls, monitor exposure and provide adequate information, instruction and training.

The Health and Safety Commission (HSC) published approved code of practice, "Legionnaire's Disease – The control of Legionella bacteria in water systems" (L8)¹ sets out the required standard.

Section 4 - Related References:

Section 5 - Identification, Monitoring and Review

This policy will be reviewed annually by the Facilities and Environmental Manager

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Previous policies can be found with the continuous improvement team.