Innsworth Preschool Water Hygiene and Legionella Policy
Last Updated: June 2026

1. Purpose and Scope

1.1 Overview: This policy outlines our statutory responsibilities and procedures for preventing Legionnaires' disease through the proper management of our water systems.

1.2 Objective: It is designed to ensure the health and safety of all children, staff, and visitors by minimising the risks associated with legionella bacteria while simultaneously managing scalding risks for children.

2. Legal and Statutory Framework

2.1 Compliance: This policy complies with our duties under the following:

- The Health and Safety at Work etc. Act 1974
- The Control of Substances Hazardous to Health (COSHH) Regulations 2002
- The Management of Health and Safety at Work Regulations 1999
- HSE Approved Code of Practice (ACoP) L8: "Legionnaires' disease: The control of legionella bacteria in water systems"
- HSG274 Part 2: Technical guidance on managing hot and cold water systems

3. Our Principles

3.1 Approach:

- **Health and Safety First:** We will maintain clean, safe, and temperature-controlled water systems.
- **Legal Compliance:** We will follow all statutory obligations under ACoP L8 and COSHH 2002.
- **Prevention and Control:** We use system design, temperature control, and regular flushing to prevent Legionella growth.

- **Staff Awareness:** Roles are clearly assigned, and staff are trained to ensure compliance.
- **Ongoing Monitoring:** We maintain clear and accurate records in line with HSE guidance.

4. Risk Assessment and Written Scheme

4.1 Risk Assessment: A suitable and sufficient Legionella Risk Assessment is in place.

- **Review:** This is reviewed regularly and whenever there are significant changes to the water system, building use, or population. We will commission re-assessment at an interval recommended by the competent assessor.
- **Scope:** The assessment identifies risks such as stagnant water, dead legs, and aerosol-generating outlets.

4.2 Written Scheme of Control: We maintain a written scheme of control which includes:

- A description/schematic of the system.
- Identified risk points (e.g., dead legs, little-used outlets).
- The monitoring plan and control limits.
- Corrective actions for non-conformance.
- Responsibilities and competence requirements.

5. Temperature Control and Scalding Prevention

5.1 Legionella Control (System Temperatures): To prevent bacterial growth, we adhere to the following HSE parameters:

- **Hot Water Storage:** Hot water is stored at **60° C or higher**.
- **Hot Water Distribution:** Distributed to reach **50° C or higher** within one minute at sentinel outlets (before any blending valve).
- **Cold Water:** Maintained at a temperature **below 20° C** within two minutes of running.

5.2 Scalding Control (User Temperatures):

- **Risk Assessment:** We conduct a specific **Scalding Risk Assessment**. Where vulnerable users (including the very young) can access washing facilities, appropriate controls are applied.
- **Temperature Reduction:** Where outlets are accessible to children, the temperature is reduced at the point of use (using Thermostatic Mixing Valves - TMVs) to a maximum safe temperature (typically 43°C for baths/showers, 41°C for washbasins) in line with the scalding risk assessment.
- **TMV Maintenance:** TMVs (Type 3 where required) are maintained and serviced as part of planned preventative maintenance. We ensure that temperature control for scalding safety does not undermine the high temperatures required upstream for legionella control.

6. Monitoring and Maintenance Tasks

6.1 Monitoring Temperatures: Monthly temperature checks of **sentinel outlets** (the nearest and furthest outlets from the source on each loop) are conducted by a designated, competent staff member.

- **Criteria:** Checks verify that cold water is <20°C and hot water reaches 50°C within one minute.
- **Records:** All results are recorded in the Water Hygiene Logbook.

6.2 Flushing (Stagnation Control):

- **Little-Used Outlets:** Any outlet not used for **7 days or more** is defined as "little used" and must be flushed weekly.
- **Method:** Flushing is conducted at low flow to minimise splashing and aerosol creation. It continues for at least 2 minutes (or until temperature stabilises). This is ideally done when children are not present.
- **Closures/Holidays:** A flush plan is implemented following any holiday closure or period of low occupancy. A documented flush of all outlets is required before children return.

6.3 Cleaning and Descaling:

- **Aerosol Risks:** Shower heads, spray taps, and outdoor hoses are risk-assessed.
- **Action:** Quarterly cleaning and descaling is carried out to remove scale and sediment (nutrient sources for bacteria).

6.4 Non-Conformance Protocol: If a temperature check is out of range:

1. **Immediate:** Re-check the outlet to confirm.
2. **Action:** Isolate the outlet if necessary. Inform the Responsible Person immediately.
3. **Corrective:** Instruct a competent contractor/maintenance to investigate (e.g., adjust calorifier, repair TMV).
4. **Review:** Document the corrective action and consider if a risk assessment review is needed.

6.5 Works and Commissioning: Any plumbing works, installation of new outlets, or significant periods of stagnation trigger flushing, disinfection, and commissioning steps as advised by the competent contractor. Records of this are retained.

7. Roles, Responsibilities, and Competence

7.1 Responsible Person: The **Business Manager** is the designated **Responsible Person** for Legionella control. They ensure the scheme is implemented and risk assessments are current.

7.2 Competence:

- **Staff:** The Responsible Person and any staff delegates conducting checks receive training and are assessed as competent to perform water hygiene tasks, understand control limits, and know escalation steps.
- **Contractors:** Any work or servicing is conducted only by suitably qualified and competent professionals (e.g., Legionella control specialists).

8. Monitoring and Review

8.1 Records: A dedicated **Water Hygiene Logbook** is maintained, containing risk assessments, the written scheme, temperature checks, flushing records, cleaning schedules, and service reports.

- **Retention:** Records are retained for the period required by HSE guidance and our written scheme of control (minimum 5 years). Records are kept in the office and audited annually.

8.2 Policy Review: This policy is reviewed annually, or immediately if the water system changes or following any health and safety advice.