

PITSTONE PARISH COUNCIL

Water Hygiene Policy

1. What is this policy about?

This policy sets out our approach to managing risks from exposure to Legionella bacteria at our pavilion site, to ensure the safety of all colleagues, hirers, contractors and any other members of the public who might be affected by water systems under our control. This policy is provided as per our responsibilities under the Health & Safety at Work Act (1974) as per the HSE Guidance “Legionnaires’ disease The control of legionella bacteria in water systems ACoP L8”.

2. Scope

This policy applies to the operation and maintenance of all water systems where there is the potential for legionella to grow and become dispersed as a respirable aerosol.

The sources include, but are not limited to, the following systems:

- Hot and cold water supplies
- Taps and showers
- Any other systems identified by a risk assessment as posing a risk

We recognise that the Parish Council are responsible for the management of water systems beyond the designated stop-cock for our site. The local Water Provider, Anglian Water, is responsible for providing Wholesome Water to the site (as per the Water Supply (Water Quality) Regulations 2016 (our site is supplied from the mains water supply and we have no cold water storage tank).

3. Policy Statement for Legionella Control

Water quality can represent a significant risk to health and the responsibility of the Parish Council is to ensure adequate measures are in place to control the risks. Legionnaires’ disease can prove fatal and can affect anyone, however, some people are at higher risk of infection, such as those over 45 years of age, smokers and heavy drinkers, people suffering from chronic respiratory disease and anyone with an impaired immune system.

Hot water should be distributed at 50°C or higher (thermostatic mixer valves need to be fitted as close as possible to outlets, where a scald risk is identified).

Cold water should be distributed below 20°C. However, in warmer periods (e.g. the summer) the Water Provider can supply water to the site up to 25°C. Additional water sampling may be required at these times to account for this.

The Council accepts it must take precautions necessary to protect the welfare of colleagues, contractors, hirers and visitors to their premises and to ensure that the highest, reasonably practicable standards are maintained and guidance relating to the prevention of legionella, issued by authorities are followed, as per the HSE ACoP L8 Guidance.

Our bi-annual risk assessment, conducted by First Environment, details specific control measures that are required for the pavilion. These are then implemented and reviewed annually or earlier if required.

4. Responsibilities

4.1. General

We will undertake the following approach to water quality control as per ACoP L8
Guidance:

- Appoint a responsible person, in this case Laurie Eagling the Parish Clerk, to be managerially responsible for implementing the water hygiene management plan.
- Appoint a deputy responsible person, normally the site manager, in this case Dave Burton the Facilities Manager.
- Appoint a Duty Holder, in this case the Sports and Leisure Committee of the Parish Council, and in particular Bob Saintey as Chair of that Committee.
- Identify and assess sources of risk by implementing a programme of water hygiene risk assessments in order to locate and identify conditions that encourage bacteria to multiply.
- Appoint competent persons (in this case, First Environment Ltd) with specialist knowledge to carry out risk assessments on our behalf, to be carried out as per BS8580.
- Prepare and maintain a written scheme for controlling the water hygiene risks identified.
- Implement, manage and monitor all control measures following a water hygiene risk assessment.
- Review risk assessments within period stated within the last Legionella Risk Assessment or every two years minimum, or when there are significant changes to the water system of the building or when there are significant changes to the site population or where there is a legionella detection or legionellosis incident as applicable
- Keep schematic drawings of the hot and cold-water systems up-to-date.
- Specify necessary routine water hygiene tasks and checks.
- Commission only competent and appropriately qualified contractors to complete works on water systems.
- Provide training for all employees engaged in routine water hygiene tasks and checks – Dave Burton, Stephen Davies and Laurie Eagling have all undertaken Legionella Awareness training and this is refreshed every 3 years.
- Provide an appropriate level of information and training for those with responsibilities under this policy statement.

4.2. Pavilion Specific

Following the risk assessment, the pavilion is to be provided with control measures specific for our site – please refer to the Legionella ring binder. It is the responsibility of the Facilities Manager / Deputy Responsible Person to ensure those measures are implemented. All checks must be recorded on the record sheets provided and retained within the ring binder for audit purposes.

5. Risk Assessments

A risk assessment for the site will be completed within period stated within the last Legionella Risk Assessment or every two years minimum, or when there are significant changes to the water system of the building or when there are significant changes to the site population or where there is a legionella detection or legionellosis incident has occurred as applicable. The risk assessment has clearly defined measures to control the risks from exposure to Legionella bacteria and suggestions on how those measures should be implemented and managed by the

Parish Council and the Facilities Manager for the pavilion. The risk assessment must be carried out by a competent person as per BS8580.

A copy of each risk assessment will be kept at the pavilion for a period of 5 years. All pavilion based staff have a role in protecting health and safety at our premises, as such basic information on Legionella will be provided to all applicable staff, and specific training and instruction will be given to all those directly involved with implementing the measures identified in the risk assessment (all 3 members of staff are Legionella Awareness trained, and this is refreshed every 3 years).

6. Remedial Works

Remedial works are to be carried out as identified within the Legionella Risk Assessment and ongoing control scheme monitoring. The responsible person and deputy responsible person are responsible for establishing a remedial works program. Works are to be carried out in a risk prioritised order and as per budgetary allowances. All remedial works must be carried out by a competent person. Records of remedial works will be kept for a minimum of 5 years.

7. Water Sampling for Legionella and Potable Water

Routine water sampling will be carried out on at least an annual basis.

All water samples are to be taken by a competent person and analysed at a UKAS Accredited laboratory. All external contractors should notify us as soon as reasonably practicable if pathogenic bacteria (e.g. legionella, Coliforms or E.coli) has been detected (ideally within 1 working day). Any relevant new and existing contractors to be informed that this is the expectation.

7.1. Water Sampling for Legionella

Water sampling for Legionella must be carried out by a competent person as per BS7592 and analysed at a UKAS Accredited laboratory.

Water samples are to be taken as specified by the Legionella Risk Assessment or where control measures are not being consistently achieved, as per Para 2.120 HSG274 pt2. For example, if hot or cold water temperatures are not in compliance with the ACoP L8 Guidance requirements for 2 consecutive months.

If legionella bacteria have been detected by the external assessor, the following actions are to be taken as per the HSG274 pt2 Table 2.2:

If the minority of the samples are positive and levels are <1000 cfu/ltr

- Resample the affected water system to determine the extent of the contamination.
- Review the control measures and risk assessment
- Carry out remedial action following the review of control measures and risk assessment
- Consider disinfection of the affected water system/s
- Resample to determine if satisfactory control has been achieved (levels from all locations are <100 cfu/ltr)

If the majority of the samples are positive or levels are >1000 cfu/ltr

- Carry out a disinfection of affected water systems, as soon as possible to suppress Legionella levels as per BS8558 and HSG274 pt2.
- Resample the affected water system to determine the extent of the contamination.
- Review the control measures and risk assessment

- Carry out remedial action following the review of control measures and risk assessment
- Consider disinfection of the affected water system/s
- Resample to determine if satisfactory control has been achieved (levels from all locations are <100 cfu/ltr)
- Investigate and report on the cause of the legionella proliferation so lessons can be learnt and adequate control measures can be applied to the affected site and other sites as applicable
- Any necessary clearance must be obtained from the investigating authorities before processes that have been shut down are restarted.

7.2. Water Sampling for Potable Bacteria

All cold water supplies are fed direct from the mains. No cold water storage tank nor water coolers are present at the site. An annual water sample will be taken for reassurance purposes.

If Coliforms or E.coli are detected:

- Cold water supplies must be boiled first before drinking until satisfactory control is achieved as per the Water Supply (Water Quality) Regulations 2016. Alternatively, bottled water supplies can be provided.
- Thoroughly clean and disinfect affected outlet, including the removal and clean and disinfection of the tap strainer as applicable.
- Resample the affected water system to determine the extent of the contamination.
- Review the control measures and risk assessment.
- Carry out remedial action following the review of control measures and risk assessment.
- Consider disinfection of the affected water system/s (normally only required if there are repeated detections).
- Resample to determine if satisfactory control has been achieved (levels from all locations are 0 cfu or MPN/100ml)

If TVC at 37°C exceeds 100 cfu/ml or TVC at 22°C exceeds 1000 cfu/ml:

- Thoroughly clean and disinfect affected outlet, including the removal and clean and disinfection of the tap strainer as applicable.
- Resample the affected water system to determine the extent of the contamination.
- Review the control measures and risk assessment.
- Carry out remedial action following the review of control measures and risk assessment.
- Consider disinfection of the affected water system/s (normally only required if there are repeated elevated levels).
- Resample to determine if satisfactory control has been achieved.

8. Notification of Outbreaks of Legionellosis

In England and Wales, a legionellosis outbreak is notifiable under the Health Protection (Notification) Regulations 2010. Under these Regulations, human diagnostic laboratories must notify Public Health Departments of microbiologically confirmed cases of legionnaires' disease.

Legionellosis are collectively the diseases caused by legionella bacteria. The most serious of which is Legionnaires disease, which can be fatal or life changing.

An outbreak is defined as two or more cases where the onset of legionellosis is closely linked in time (weeks rather than months) and where there is epidemiological evidence of a common source of infection, with or without microbiological evidence.

It is the responsibility of the doctor to notify the Parish Council if staff/guests have contracted legionellosis.

In such an event, the Parish Council will fully comply with the local authority and proper officer in their investigations.

In the event of a confirmed case of Legionella on a site which is associated with a legionellosis outbreak, the appointed responsible person, will follow the Major Incident Plan (or similar) in relation to Legionella.

Any confirmed legionellosis outbreak associated with our site will be reported under RIDDOR guidelines.

9. Annual Review of the Control Scheme

The Responsible Person and Deputy Responsible Person will review the control scheme records annually to ensure that adequate controls are in place, remedial actions are being carried out in a timely manner, relevant training is up to date and records are being kept.

10. Environment Considerations

The Parish Council will utilise means to minimising water usage where possible, and monitor the water meter to check for leaks.

No Waste Water Discharge License is required for this site as far as we are aware.

11. Policy Adoption and Review

This policy will be reviewed annually, or whenever there is reason to believe that it requires updating by law or changes are made to the building, water system or use on site.

The review will be completed by the Facilities Manager and/or Clerk and will be considered and approved by the Sports and Leisure Committee.

This policy was adopted by Pitstone parish council on22/2/26.....

minute reference106/25.4..... and will be reviewed on at least an annual basis.

Signed on behalf of Pitstone Parish Council by:

J Hawkins

Chairman

APPENDIX 1

Control measures identified in the latest Risk Assessment

| Hot and Cold Water Systems | | |
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| Item | Control Action | Frequency |
| Hot water heaters and storage vessels | Inspect internally by removing the inspection hatch or using a borescope and clean by draining the vessel. The frequency of inspection and cleaning should be subject to the findings and increased or decreased based on conditions recorded. | Annually, or as indicated by the rate of fouling |
| Hot water heaters and storage vessels | Check flow temperatures (thermostat settings should modulate as close to 60°C as practicable without going below 60°C). Check return temperatures (not to be below 50°C). | Monthly |
| Hot water services - circulating systems | Take temperatures at return legs of principal loops (sentinel points) to confirm they are at a minimum of 50°C. | Monthly |
| Hot water services - circulating systems | Take temperatures at a representative selection of other outlets in circulating systems to confirm they are at a minimum of 50°C to create a temperature profile of the whole system over a defined time period to ensure the whole system is reaching satisfactory temperatures for legionella control. | Monthly considered on a rotational basis |
| Cold water services | Check temperatures at sentinel taps (typically the nearest and furthest on the system, but may also include other key locations on long branches to zones or floor levels). These outlets should be below 20°C within two minutes of running the cold tap. To identify any local heat gain, which might not be apparent after two minutes, observe the thermometer reading during flushing. | Monthly |
| Cold water services | Take temperatures at a representative selection of other points to confirm they are below 20°C to create a temperature profile of the whole system over a defined time period to ensure the whole system is reaching satisfactory temperatures for legionella control. Peak temperatures or any temperatures that are slow to fall could be an indicator of a localised problem. | Representative selection of other outlets considered on a rotational basis. |
| Pipework | Check thermal insulation to ensure it is intact and consider weatherproofing where components are exposed to the outdoor environment. | Annually |
| Tap outlets | Inspect clean and descale as necessary. | Annually |
| Shower and spray outlets | Dismantle, clean and descale removable parts, heads, inserts and hoses where fitted. | Quarterly |
| Infrequently used outlets (seldom used outlets) | Flush the outlets until the temperature at the outlet stabilises and is comparable to supply water and purge to drain. Regularly use the outlets to minimise the risk from microbial growth in the peripheral parts of the water system, sustain and log this procedure once started. | Weekly |
| Thermostatic mixer valves | Inspect, clean, descale and disinfect any strainers or filters associated with thermostatic mixer valves and undertake failsafe checks. | Annually |
| Thermostatic mixer taps | Inspect, clean, descale and disinfect any strainers or filters associated with thermostatic mixer taps and undertake failsafe checks. | Annually |
| Magnetic descale units | Check unit is operating. | Monthly |
| Magnetic descale units | Service and maintain. | According to the manufacturer's guidelines |
| Expansion vessels | Where practical, flush through and purge to drain. | Six monthly |
| Expansion vessels | Replace internal bladders | Every five years or as recommended by the manufacturer |

APPENDIX 2

Methodology and Responsibility for Control measures

See associated file

APPENDIX 3

Response Actions to Out of Line Conditions

If the temperature reading is not within the required parameters :

- If only minor difference, monitor during the month and check again.
- NB during summer months the cold water will take longer to reach temperature than during the winter months as the water sitting in the internal pipework wont be as cold.
- Adjust the TMV if necessary to correct temperature.
- If issue continues, change TMV if necessary or it has reached the end-of-life (eta 5-years). The Parish Council holds a supply to ensure that they can be replaced quickly if required.
- If problem persists, escalate to the Responsible Person and seek a service visit/quotation from Ambivent.
- Quotations/works to be considered/approved by the Sports and Leisure Committee.
- Record all actions in binder.

If the shower heads are not working correctly (eg cutting out too soon, or sticking on) :

- Change shower head cartridges and rings when required. The Parish Council holds a supply to ensure that they can be replaced quickly if required.
- If problem persists, escalate to the Responsible Person and seek a service visit/quotation from Ambivent.
- Quotations/works to be considered/approved by the Sports and Leisure Committee.
- Record all actions in binder.

Other failures :

- Annual service contract in place with Ambivent Facilities Management. Council must ensure that a service contract is always in place with a supplier.
- If any other failures are identified during the year, eg pumps etc, then :
- Escalate to the Responsible Person and seek a service visit/quotation from Ambivent.
- Quotations/works to be considered/approved by the Sports and Leisure Committee.
- Record all actions in binder.

Any changes to the water system :

- Adjustments/works must be considered by the Sports and Leisure Committee.
- Record all amendments in the binder and on the schematic.

Service / call out reports :

- Ensure all filed in the binder.