Legionella Written Scheme

Attlee Square, Sherburn, Co Durham, DH6 1JN

April 2024

Version	Author	Date	Review date	Comments/amendments
1.0	E Jorgenson	14/05/2020	14/05/2021	N/A
2.0	E Jorgenson	27/10/2020	26/08/2020	Updates following new risk assessments and updates sections 7-12 added
3.0	A Graham	03/10/2022	03/10/2023	Updates following new risk assessment
4.0	A Graham	03/10/2023	02/08/2024	Review
5.0	A Graham	17/04/2024	02/08/2024	Update following change of risk assessment contractor

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1. Purpose

The purpose of this document is to detail the site-specific written scheme for Attlee Square Community Centre Communal Hall.

2. Scope

This written scheme covers the domestic water system only within the property. There is no risk linked with any close systems in the property and therefore this has not been included in the scope.

3. Risk Assessment

The risk assessment and schematic diagram can be found in appendix one of this written scheme. All risk assessments for believe housing are completed by a Legionella Control Association registered company who have been selected through a full and proper procurement exercise.

This risk assessment was carried out on the 02nd August 2022. The site will be audited on an annual basis to assess the validity of the assessment and when it is considered no longer valid a new risk assessment will be arranged. The assessment may be considered invalid when;

a) There are changes to the water system or its use;
b) Changes to the use of the building in which the water system is installed
c) The availability of checks indicating that control measures are no longer effective
d) Changes in key personnel
e) A case of legionnaires disease/legionellosis associated with the system.

Following the risk assessment, an action plan has been formulated and details of this can be found located in the premises log. This shows all the recommendations made in the risk assessment and the actions that believe housing are taking.

4. Management Structure

The management structure for the group is as follows.

Statutory Duty Holder	
Position	Chief Executive
Address	believe housing, Coast House, Spectrum 4, Spectrum Business Park, Seaham
Postcode	SR7 7TT
Nominated Responsible Person Emma Jorgenson	
Position	Compliance Manager
Address	believe housing, Coast House, Spectrum 4, Spectrum Business Park, Seaham
Postcode	SR7 7TT
Training	City and Guilds Qualificatons “management of legionella bacteria in hot and cold water systems” and “hazard identification and risk assessment of water systems within buildings” and regular attendance of the north east councils legionella focus group (NECLFG).
Nominated Responsible Person (Deputy) – Andrew Graham (principle contact)	
Position	Compliance Officer
Address	believe housing, Coast House, Spectrum 4, Spectrum Business Park, Seaham
Postcode	SR7 7TT
Phone	07901510712
e-mail	Andrew.graham@believehousing.co.uk
Training	City and Guilds Qualificatons “management of legionella bacteria in hot and cold water systems” and regular attendance of the north east councils legionella focus group (NECLFG).
Facilities Officer – Pamela Wilson	
Position	Facilities officer
Address	believe housing, Coast House, Spectrum 4, Spectrum Business Park, Seaham
Phone	07384523628
e-mail	Pamela.wilson@believehousing.co.uk
Training	Believe houisng legionella on line e-learning package
Risk Assessment Contractor – SMS Environmental	
Address	Strathclyde Business Park, Suite1/2 Avondale House, Bellshill ML4 3NJ
Postcode	ML4 3NJ
Contact	Jemma Tennant
Phone	07521390672
e-mail	j.tennant@sms-environmental.co.uk

Water Monitoring Contractor – Hsl Compliance Ltd	
Address	Suit 7 (Phase 2), The Grainger Suite, Dobson House, Regent Centre, Newcastle upon Tyne
Postcode	NE3 3PF
Contact	David Armstrong & Phil Lynas
Phone	078233499745 & 07909706236
e-mail	David.Armstrong@hslcompliance.com & Phil.Lynas@hslcompliance.com
Little used flushing - Contego	
Address	Unit 4 , Maple Way, Aycliffe Business Park, Newton Aycliffe, County Durham,
Postcode	DL5 6BF
Phone	07966473063
e-mail	Martin.Ferguson@contegofacilities.com

Full details regarding the responsibilities of the Duty Holder, Responsible Person and Deputy Responsible Person can be found in the legionella policy.

Full details of the responsibilities of the contractors employed by believe housing, to complete the legionella programs can be found detailed in the specification of the tender and strategic legionella management plan.

5. Asset Register

	Asset Number	Location (detail any specific access requirements)	Serving
Cold Water Storage Tanks		None	
Water Heaters	IWH1	Kitchen (Combi Boiler)	DHWS to site
Showers		None	
TMV's	TMV1	Toilet	3 x WHB
Other Systems		None	

6. Scheme of Control

6.1 Site description

Attlee Square is a community facility and is also used for welfare for the Property Repairs team. Hot water is provided via a combi boiler in the Kitchen which is on 24/7. All cold water is provided via the mains supply.

6.2 Building use and access

Access to the site is available by entering a code into a keypad on site and the code for this is 5665

6.3 Monitoring program

The risk assessment has shown that there is a reasonably foreseeable risk of legionella contamination in this building. Therefore, a scheme of control has been formulated and implemented at this site. The current program in place on site is a physical treatment program using temperature rather than biocides as a form of control. The specific program for this site is detailed as follows;

<u>Monthly tasks</u>
hsl will visit the site once every month and monitor hot and cold water temperatures.

Hot water temperatures will be taken from sentinels located in

Location	Floor	Item	Water Source
Kitchen (near sentinel)	Ground Floor	SNK	IWH1
Toilet (far sentinel)	Ground Floor	WHB	IWH1

Cold water temperatures will be taken from sentinel outlets located in

Location	Floor	Item	Water Source
Kitchen (near)	Ground Floor	SNK	Mains
Male WC (far)	Ground Floor	WHB	Mains

The temperature from every outlet will be taken at least once annually.

All hot water from point of use, instant water heaters or combi boilers must be supplied to hot outlets and TMV’s at above 50°C within 1 minute. All cold water must be supplied to cold outlets at below 20°C within 2 minutes.

The TMV’s in the Toilet will be subject to a full service and failsafe testing on an annual basis in accordance with the method statements submitted by HSL.

7 Record Keeping

All records of site visits and little used flushing are kept in the site premises file with the risk assessment and this written scheme.

All other monitoring records are held on the web-based portal Socius which can be accessed by using the following log in details.

Username: BelieveHousing@socius.com

Password: Thursday16

A short user guide for this system has been developed by the Compliance Team and is also available in the premises log.

All records for legionella control will be kept for a minimum of 5 years as per the retention schedule detailed in the Approved Code of Practice L8.

8 Microbiological testing

Microbiological testing is not completed on this site as a matter of course as there is no requirement to do so. However, testing for legionella bacteria will be completed in the if the correct temperatures (as detailed in section 6.3) are not being. Where this is the case samples will be taken weekly from the sentinels in the building along with any other key areas. Initially all samples will be post-flush however pre-flush samples may be used to ascertain local issues during the sampling process. Following the resolution of the situation sampling frequency will be slowly reduced and stopped when appropriate.

All sampling will be completed in accordance with BS7592 “sampling for legionella organisms in water and related materials”. All samples will be set for analysis at a UKAS accredited laboratory with current ISO standard methods of detection and enumeration of legionella included in the scope of the accreditations. The laboratories used also take part in external QA proficiency schemes to provide extra assurance.

9 Remedial Actions

On a regular basis, the Compliance Officer nominated as Deputy Responsible Person, will check monitoring results on the web-based portal via exception report. All non-compliant results will subject to a desk top investigation to ascertain the extent and consistency of the issue. Where temperatures are consistently unable to achieve the required standards, or the monitoring raises other potential issues the Compliance Officer will raise relevant orders with Internal Repairs or external partners dependant of the works required. The Compliance Officer will advise on time scales for action depending on the risk the issue poses, which will be added to the ticket raised on QL. Where necessary legionella sampling may be requested on a weekly basis until the issue is resolved (see section 8).

Where issues with stagnation or lack of flushing are highlighted, due to a change of building use, the Facilities Coordinator will be advised so the little used flushing program can be extended or started to ensure the water turn over in the building is adequate.

10 Incident Plan

Where contamination is identified in water systems the following action will be taken at the following thresholds.

Legionella bacteria (cfu/l)	believe housing's actions
>100 and up to 1000	Either; • If the minority of samples are positive, the system will be resampled. If similar results are detected again, the control measures and risk assessment will be reviewed, and any remedial works identified and completed or; • If the majority of the samples taken are positive, the systems may be colonised at a low level. The control measures and risk assessment will be reviewed, and any remedial works identified and completed. A clean and disinfection of the system will also be carried out. In both cases the system will be continually resamples until assurance is given that the system is back under control.
>1000	The control measures and risk assessment will be reviewed, and any remedial works identified and completed. A clean and disinfection of the system will also be carried out. The system will be continually resampled until assurance is given that the system is back under control.

Where the thresholds above are met the Compliance Team will coordinate the organisations response to the incident. Where input is required from other areas of the organisation groups will be set up to coordinate the response, this may include but not be limited to the Compliance Manager, Strategic Assets Business Partner, Assets Project Manager, Contract and Leasehold Manager, Repairs and Maintenance Manager (Repairs), Facilities Coordinator, Health and Safety Officer, Neighbourhoods Team Leader and any third party contractors involved in the maintenance of the water system in the affected building. An actions log will be started to document believe housings response to the contamination. This will be shared with the Compliance Manager and all other relevant parties as necessary.
Any incidents of contamination will be reported in the weekly compliance meeting and documented accordingly

During this time the system will be sampled weekly. Further control measures may be introduced, such as point of use filtration and chemical dosing, to ensure the safety of any users or occupants. In some cases, buildings may have to be temporarily closed for works to be completed.

When works are complete the Compliance Team will continue to sample the system, reducing the frequency gradually until it is assured that control has been regained.

11 Actions in response to partial of full system shut down

Simple Systems

11.1 Temporary lack of use and mothballing

Where the water usage in this property is temporarily reduced (e.g. no groups are using the property) little used flushing will be instigated or expanded to include those areas which are no longer used. This flushing will be conducted weekly (this could be by Compliance Team Members, Neighbourhoods Offices or the Companies contracted to clean the facility) and a record of this will be made and placed in the legionella section of the premise's logbook.

As this is a simple system, where the property is going to be taken out of use for a period in excess of 30 days it will be drained down following guidance in PD 855468:2015 (5.2.4)

11.2 Recommissioning

Where the property has been drained down the system will be refilled and a cleansing flush completed before a clean and disinfection is carried out in accordance with method statements that hsl have submitted and in accordance with the ACoP L8 (2014), and HSG 274 pt2. Four days after the clean and disinfection is completed samples will be taken from the properties sentinel outlets to test for coliforms, E. coli, 37 and 22C TVC's and Legionella. Hygiene flushing will be undertaken weekly until the results are received. If Coliforms, E. coli, or elevated TMV's are detected the sampling point will be cleaned, flushed and retested. If Legionella bacteria is detected the steps taken in section 10 of this written scheme will be taken and which may lead to the system being cleaned and disinfected again.

12 Forms/templates to be used

Site audit form,

Little used flushing form (LM006)

Contractor sign in sheet,

Legionella risk assessment action plan (LM005)

13 Associated Documents

Legionella Management Policy

Strategic Legionella Management Plan

Procurement Specification

COSHH records for chemicals used on site