

**Legionella Written Scheme**

**Coast House**

**April 2024**

Version	Author	Date	Review date	Comments/amendments
1.0	E Jorgenson	09/03/2020	09/03/2021	N/A
2.0	A Graham	11/10/2022	11/10/2023	New Risk Assessment and changes to roles and responsibilities
3.0	A Graham	11/10/2023	11/10/2024	Review
4.0	A Graham	17/04/2024	17/04/2024	Update due to change of risk assessment contractor

## Contents page

<b>Section number</b>	<b>Title</b>	<b>Page number</b>
1	<b>Purpose</b>	<b>3</b>
2	<b>Scope</b>	<b>3</b>
3	<b>Risk Assessment</b>	<b>3</b>
4	<b>Management Structure</b>	<b>4</b>
5	<b>Asset Register</b>	<b>6</b>
6	<b>Scheme of Control</b>	<b>7</b>
7	<b>Record Keeping</b>	<b>9</b>
8	<b>Microbiological testing</b>	<b>9</b>
9	<b>Remedial Actions</b>	<b>9</b>
10	<b>Incident Plan</b>	<b>10</b>
11	<b>Actions in response to partial of full system shut down</b>	<b>11</b>
12	<b>Forms/Templates</b>	<b>11</b>
13	<b>Associated Documents</b>	<b>11</b>

## **1. Purpose**

The purpose of this document is to detail the site-specific written scheme for Coast House.

## **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 2nd February 2024. The site will be audited on an annual basis to assess the validity of the assessment and when it is considered no longer valid a new risk assessment will be arranged.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.

[https://cdhg.sharepoint.com/:b:/s/complianceandfacilities/ERjT79Q9\\_3BIsD7FO6tAUkwB2JIQS5ZKrSgdbZ0fUxJT1Q?e=MtJv3Y](https://cdhg.sharepoint.com/:b:/s/complianceandfacilities/ERjT79Q9_3BIsD7FO6tAUkwB2JIQS5ZKrSgdbZ0fUxJT1Q?e=MtJv3Y)

#### 4. Management Structure

The management structure for the organisation is as follows.

Statutory Duty Holder	
<b>Position</b>	Chief Executive
<b>Address</b>	believe housing, Coast House, Spectrum 4, Spectrum Business Park, Seaham
<b>Postcode</b>	SR7 7TT
Nominated Responsible Person Emma Jorgenson	
<b>Position</b>	Compliance Manager
<b>Address</b>	believe housing, Coast House, Spectrum 4, Spectrum Business Park, Seaham
<b>Postcode</b>	SR7 7TT
<b>Training</b>	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)	
<b>Position</b>	Compliance Officer
<b>Address</b>	believe housing, Coast House, Spectrum 4, Spectrum Business Park, Seaham
<b>Postcode</b>	SR7 7TT
<b>Phone</b>	07901510712
<b>e-mail</b>	Andrew.graham@believehousing.co.uk
<b>Training</b>	City and Guilds Qualifications “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	
<b>Address</b>	believe house, Coast House, Spectrum 4, Spectrum Business Park, Seaham, Co Durham
<b>Position</b>	Facilities Officer
<b>Phone</b>	07384523628
<b>e-mail</b>	Pamela.wilson@believehousing.co.uk
<b>Training</b>	Believe housing online awareness training
Risk Assessment Contractor – SMS Environmental	
<b>Address</b>	Strathclyde Business Park, Suite1/2 Avondale House, Bellshill ML4 3NJ
<b>Postcode</b>	ML4 3NJ
<b>Contact</b>	Jemma Tennant
<b>Phone</b>	07521390672
<b>e-mail</b>	j.tennant@sms-environmental.co.uk

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

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	CAL01	Top Floor Cupboard Next to Gents WC	DHWS to all but sinks in Pit Stop Kitchen
	WH1	Pit Stop Kitchen	1 x SNK
	WH2	Staff Area Behind Pit Stop Left Sink	1 X SNK
	WH3	Staff Area Behind Pit Stop Right Sink	1 x SNK
Showers	SHR1	First Floor Shower Room	1 X SHR (Thermostatic) Decommissioned
	SHR2	Second Floor Shower Room	1 X SHR (Thermostatic) Decommissioned
	SHR3-5	First Floor Changing Rooms	3 X SHR (Electric)
TMV's	TMV1	Ground Floor Gents WC	1 x TMV
	TMV2	Ground Floor Ladies WC	1 x TMV
	TMV3	Ground Floor Accessible WC	1 x TMT
	TMV4	First Floor Ladies WC	1 x TMV
	TMV5	First Floor Accessible WC	1 x TMT
	TMV6	First Floor Gents WC	1 x TMV
	TMV7	Second Floor Ladies WC	1 x TMV
	TMV8	Second Floor Accessible WC	1 x TMT
	TMV9	Second Floor Gents WC	1 x TMV
Other Systems	EXP01	First Floor Pit Stop Kitchen	1 x EXP
	EXP02	First Floor Staff Area Behind Pit Stop Left Sink	1 x EXP
	EXP03	First Floor Staff Area Behind Pit Stop Right Sink	1 x EXP

## 6. Scheme of Control

### 6.1 Site description

This property is a three-story office space with WC's and Kitchens on each floor. There are also showers on the 1<sup>st</sup> and 2<sup>nd</sup> floors. Hot water is provided via a mains fed electric water heater and 3 sub 15L water heaters. All cold water is supplied via mains.

### 6.2 Building use and access

The age ranges of users of this site is between 16 and 65 years of age. It is safe to assume that amongst these some individuals may fall into groups which would be susceptible to legionellosis, however this will be a minority. The officers are available for all believe staff to work from or hold meetings as well as using the facilities for welfare.

### 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;

#### Weekly tasks

Due to the reduced usage of the property, the Facilities Coordinator have appointed the onsite cleaning contractors Contego will flush all outlets in the property for 5 minutes weekly and this action is recorded and placed in the Legionella logbook.

#### Monthly tasks

hsl will visit the site once every month and monitor hot and cold-water temperatures. Hot water temperatures will be taken from the flow and return of the heater located in the Top Floor Cupboard Next to the Gents WC's.

Hot water temperatures will be taken from sentinels located in

Location	Floor	Item	Water Source
Ladies WC (near sentinel)	2 <sup>nd</sup> Floor	Wash Hand Basin	CAL01
North Wing Office Kitchen (far sentinel)	2 <sup>nd</sup> Floor	Sink	CAL01
North Wing Office Kitchen (far sentinel)	1 <sup>st</sup> Floor	Sink	CAL01
Pit Stop Kitchen	1 <sup>st</sup> Floor	Sink	WH1
Staff Area Behind Pit Stop Left Sinks	1 <sup>st</sup> Floor	Sink	WH2

Staff Area Behind Pit Stop Right Sinks	1 <sup>st</sup> Floor	Sink	WH3
South Wing Office Kitchen (far sentinel)	Ground Floor	Sink	CAL01

Cold water temperatures will be taken from sentinel outlets located in

Location	Floor	Item	Water Source
North Wing Office Kitchen (near sentinel)	Ground Floor	Sink	Mains
South Wing Office Kitchen (far sentinel)	Ground Floor	Sink	Mains
North Wing Office Kitchen (far sentinel)	1 <sup>st</sup> Floor	Sink	Mains
North Wing Office Kitchen (far sentinel)	2 <sup>nd</sup> Floor	Sink	Mains

The temperature from every outlet will be taken at least once annually. If an outlet is controlled by a TMV the temperature of the water entering the valve will be recorded.

All hot water from water heaters must be stored at above 60°C and supplied to hot outlets or thermostatic mixing valves at above 50°C within 1 minute. All hot water from point of use water heaters must supplied to hot outlets or thermostatic mixing valves at above 50°C within 1 minute. All cold water must be stored at below 20°C and supplied to cold outlets or thermostatic mixing valves at below 20°C within 2 minutes.

### Quarterly

The 3 showers located on the 1<sup>st</sup> Floor will be cleaned and disinfected quarterly in line with the method statements that hsl have submitted and in accordance with the ACoP L8 and HSG274 pt2.

### Six-monthly

The expansion vessels associated with the expansion vessels in the pit stop kitchen (x3) will be flushed through on a six-monthly basis.

### Annually

The insulation on the cold-water pipe work throughout the building will be checked and where levels are found to be unsatisfactory additional insulation will be added.

All TMV's on site will be subject to a full service and failsafe testing on an annual basis in accordance with the method statements submitted by hsl. If the valve does not pass the failsafe test it will be serviced fully or replaced.

There is no drain valve fitted to the water heater in the top floor cupboard so therefore the water heater here will be cleaned annually. This will be completed in line with the will be carried out in line with the method statements that hsl have submitted and in accordance with the ACoP L8 (2014), and HSG 274 pt2.



## **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](mailto: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 achieved. 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 Compliance and Facilities Team 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.

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	<p>Either;</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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 be considered however the requirement for this will be decided on a case by case basis, considering all relevant factors.</li> </ul> <p>In both cases the system will be continually resamples until assurance is given that the system is back under control.</p>
>1000	<p>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.</p>

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.

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**

### **11.1 Temporary lack of use**

Where the water usage in this property is temporarily reduced little used flushing will be expanded to include those areas which are no longer used. This flushing will be conducted weekly by the Facilities Coordinator and a record of this will be made and placed in the legionella section of the premise's logbook.

Where the entire property is out of use, the water system will be kept live and managed using hygiene flushing a least once per week at all outlets for a minimum of five minutes.

### **11.2 Recommissioning**

Where hygiene flushing can't be completed, or the water system has had to be drained the system will be fully recommissioned. Where the property has been drained down the system will be refilled, and then 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 tested 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