

Legionella Water Risk Assessment
Completed in Accordance with
ACoP L8 (2014) 8580 & HSG274



The Winterton Hall

Risk Assessment for Plaistow and Ifold Parish Council – Winterton Hall for Legionella L8 ACoP on the 3rd March 2022

Current Risk Rate



This Risk Assessment has been carried out in accordance with L8:2014 Approved Code of Practice Legionnaires Disease – The Control of legionella bacteria in water systems under the Health and Safety at Work Act 1974

Site Description and Location	
Property	Winterton Hall, Loxwood Road, Plaistow, West Sussex RH14 0PX
Client	Plaistow and Ifold Parish Council, Winterton Hall, Loxwood Road, Plaistow, West Sussex RH14 0PX

Brief Description of property and Water Services
This is a purpose-built village hall that has a kitchen, ladies toilet with shower, mens toilet with shower and a disabled toilet. The mains water meter is outside in the front of the hall. The building is circa 1908. There is no cold water tank in the loft.
Areas Inspected
All areas inspected where it is understood that water services and associated plant exists. All known areas to the Risk Assessor were checked, see individual Risk Assessments for locations.
Areas not occupied or in Regular Use
N/A

Persons at Risk

Persons at risk within the building include employees of the client, parishioners of the client, visiting contractors, visitors to the tenanted areas and members of the public.

The site personnel are considered to be a typical cross section of the working population, taking into account general age, gender and health conditions of the at risk population. The group susceptibility, if exposed to Legionella, is considered to be a normal level.

An individual is classed to be in a 'higher at risk group' (ACoP L8) if they fall into any of the following categories:

- Over the age of 50 and the elderly who have breathing difficulties
- People suffering from chronic respiratory or kidney disease
- A smoker or heavy drinker
- Diabetic
- Children with asthma
- Lung and Heart disease
- Impaired immune system
- HIV and aids
- Cancer sufferers

	Nominated Authorities and Service Providers
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	Name	Position	Tel No.
Statutory Site Duty Holder	Plaistow and Ifold Parish Council	Parish Council	07798631410
Nominated Responsible Person	Catherine Nutting	Parish Clerk for Plaistow and Ifold Parish Council	07798631410
Deputy Nominated Responsible Person			
Operational Staff List all relevant			
Service Providers	Valens Water	Accredited Risk Assessor	07737779594

Other Contacts

Local Water Authority	Southern Water	Water Supplier	03303030368
A&E Dept	Royal Surrey Guildford	Hospital	01483 571122

Managing the Risk

Inadequate management, lack of training and poor communications have all been identified as contributory factors in outbreaks of Legionnaires disease. It is, therefore, important that those people involved in assessing risk and applying precautions are competent, trained and aware of their responsibilities.

The **Landlord/Managing Agent/Statutory Duty Holder** is therefore, required to appoint a person to take day to day responsibility for controlling any identified risk from legionella bacteria within each of their occupied premises for which they are responsible for water hygiene.

Water Hygiene Arrangements

Planning

Adopting a systematic approach that identified priorities and sets objectives, this assessment facilitates this process and wherever possible risks should be eliminated by the careful design and selection of facilities, equipment and processes or minimised by the use of physical control measures.

Organisation

Putting in place the necessary structure with the aim of ensuring that there is a progressive improvement in water hygiene standards.

Control

Ensuring that the decisions for promoting water hygiene are being implemented as planned.

Monitoring and Review

Like quality, progressive improvement in water hygiene can only be achieved through the constant development of policies, approaches to implementation and techniques of risk control.

Preventative Measures

Measures which have been identified by the Responsible Person in consequence of a risk assessment (as the general precautions) needs to be taken to comply with the requirements of the ACoP and other Regulations.

Legionellosis – Statutory Requirements

Legionellosis

Legionnaires disease is a potentially fatal form of pneumonia which can affect anybody but which principally affects those who are susceptible because of age, illness, immunosuppressant and smoking. It is caused by the bacterium *Legionella pneumophila* and related bacteria. *Legionella* bacteria can also cause less serious illnesses which are not fatal or permanently debilitating. The collection term used to cover the group of diseases caused by *legionella* bacteria is legionellosis.

Statutory Requirements

In January 2001 the Health and Safety Commission issued an Approved Code of Practice (ACoP) and guidance document to aid the control of legionella bacteria in building water systems and outbreaks of legionellosis. This document was entitled L8. The latest version was issued in 2014.

This document gives guidance on the requirements of the Health and Safety at Work Act 1974, The Control of Substances Hazardous to Health 2013 and The Management of Health and Safety at Work Regulations 1999 with regard to legionellosis.

The responsibilities of the employer, a self-employed person or the person who is in control of the building include:

- Identify and assess the sources of risk
- Prepare a scheme for controlling any assess risk
- Implement and manage precautions
- Keep records of precautions implemented
- Appoint a person to take managerial responsibility

A key stage in this process is the risk assessment. The purpose of this is to enable a valid decision to be made regarding:

Risk to health, i.e. whether the potential for harm to health from exposure is reasonably foreseeable (unless adequate precautionary measures are taken)

What measures for prevention, or adequate control to minimize the risk from legionella should be taken?

	Management Personnel
<p>Statutory Site Duty Holder A senior executive with budgetary control who ensures that the operation complies with the law by appointing and overseeing a competent Responsible Person. All appointments should be made and accepted in writing. The Duty Holder cannot delegate his/her duty but can delegate managerial responsibility to the Nominated Responsible Person</p> <p>Nominated Responsible Person Individual appointed with, and who has accepted, responsibility under the authority of the Duty Holder for ensuring that the organisation's responsibilities for the control of legionella are met and that all individuals and organisations assigned to carry out tasks in the scheme of legionella control are competent to do so. A member of staff sufficiently senior to hold the budget. This person would report to the Statutory Site Duty Holder and that day to day responsibility for ensuring that operational duties are carried out in a timely and effective manner and ensuring the adequate training and competence of themselves, operational staff and any contractors or sub-contractors. This person should also be responsible for the accurate audit of the site log book.</p> <p>Operational Staff Staff whose duties include inspection, monitoring, implementing, record keeping and carrying out remedial actions. There should be adequate record of their on-going training and regular assessment of their competence.</p> <p>Service Providers For example, risk assessors, monitoring companies, consultants and contractors carrying out such duties as water treatment and cleaning and disinfection. Information should also be available to show the competence of individuals and the contact details of all relevant personnel within the service provider company.</p> <p>The Client should satisfy himself that:</p> <ul style="list-style-type: none">Each of the above can be clearly identifiedThey are aware of contact details of others in the chain of commandEach role has a competent deputy identifiedEach post has been accepted in writingThere is a separate sheet for each position showing training records and competency assessment <p>It is the responsibility of the Nominated Responsible Person to ensure that Log Books are kept up to date and those actions are implemented.</p>	

Operating and Maintenance Checklist – Hot and Cold Water Systems (in accordance with HSG 294 Part 2)

Service	Task	Frequency	Task Allocation
All Systems	Risk Assessment and Schematic Drawing Audit	Regularly	Valens Water
All Systems	Risk Assessment Review	Annually	Valens Water
Hot Water Services	Check temperatures of the flow and return at the Calorifiers or point of use and representative taps on a rotational basis	Monthly	Plaistow and Ifold Parish Council
Hot Water Services	Check water temperatures up to 1 minute to see if it has reached 50°C in the sentinel taps	Monthly	Plaistow and Ifold Parish Council
	Internal checks of the calorifiers for scale and sludge	Annually	Not applicable
	Note condition of the drain water	Annually	Not applicable
Cold Water Services	Check Tank water temperatures in the tank remote from the ball valve. Check mains temperature at the ball valve.	Six Monthly	Not applicable
	Check temperatures are below 20°C after running the water for up to 2 minutes in sentinel taps. Check representative taps on a rotational basis.	Monthly	Plaistow and Ifold Parish Council
	Disinfect and cleaning CWS tanks and services	Annually or as required	Not applicable

	in accordance with L8		
Little used outlets	Flush through and purge to drain immediately before use without release of aerosols	Weekly	Plaistow and Ifold Parish Council
Thermostatic mixing valves	Check operation of fail safe	Six Monthly	Not applicable as of the 3 rd March 2022
	Descale (if necessary and disinfect)	Six Monthly	Not applicable
Sampling	Depending on the temperature profile of the water system it is recommended that samples for Legionella should be taken	Number Frequency	Valens Water if required
Water Softeners	Clean and disinfect resin and brine tank – check with manufacturer what chemicals can be used to disinfect resin bed	As recommended by manufacturer	

For all of the above actions, records should be kept in the site logbook

These operating and maintenance procedures place and supersede any previously issued procedures

O&M Procedures advocated for TMV valves are in addition to those stipulated by others to control the risk of scalding

COSHH regulation 5, Management Regulations regulation 3, HSW Act sections 2,3 and 4. These regulations require employers to make a suitable and sufficient assessment of the risk from any work liable to expose employees to any substance hazardous to health, before that work is carried out. Employers are also required to make an assessment of the risks to other people not in their employment who may be affected by the work activity.

Limitation of Report

This assessment addresses the requirements of the Approved Code of Practice L8 and associated legislation, as well as identifying measures required to comply.

The assessment covers:

- All areas, which any degree are under the control of the client.

Whilst our Water Consultants make every reasonable effort to access all areas of the premises for which the client is responsible, there may be some areas that are inaccessible or are difficult to access due to the fabric of the building. Attempting to access these areas may breach Health and Safety guidelines and in some instances could lead to the cause of unnecessary damage.

Any areas not accessed during the survey due to these considerations are outlined in section 1.

The electrical and mechanical worthiness of all plant and equipment is outside the scope of this report although the servicing and maintenance of such items may be commented upon.

In undertaking the survey no systems were isolated, unless stated otherwise. The identification of drinking water and non-drinking water may not have been possible; in such cases the need for further investigation will be stated.

This Legionella Risk Assessment is based on a combination of observations made by the Consultant at the time of the survey as well as information provided by representatives of the Client. All such information is accepted in good faith as being factual, accurate and a valid representation of the client's views.

Any changes to the occupancy, water systems, use or other circumstances of the premises will require a review of the assessment to be carried out.

Representative Outlet Temperature Profile

Area	Location	Specific Sample Point	Mains Cold	Hot	Monoblock tap or non-concussive tap TMV	Tank Cold	Compliant
Winterton Hall	Kitchen	Sink	9.8°C	56°C			Y at outlet
Winterton Hall	Disabled Toilet	WHB	8.7°C	60°C			Y
Winterton Hall	Ladies	WHB	8.5°C	63.2°C			Y

System Sample Point	Standard to comply with L8
Flow Temperature from hot	>60°C
Return Temperature to hot	>50°C
Hot Water Tap Nearest to hot	>50°C after 1 minute of running
Hot water tap furthest from	>50°C after 1 minute of running
Storage Tank	<20°C
Nearest tap to storage tank	<20°C after 2 minutes of running
Furthest tap from storage	<20°C after 2 minutes of running





TMV valves are installed to prevent scalding to users on Health and Safety grounds. Due to the blended hot water temperatures they produce they are non-compliant in respect of Legionella Control. Where TMV's have a comprehensive maintenance programme in place the potential risk is lowered but not removed.

WHB – Wash Hand Basin
POU – Point of Use water heater

Identification and Assessment of the Risk				
Item	Potential Hazard	Controls	Risks	Completed
	There has been no monthly, quarterly and annual monitoring of the water temperatures to comply with the HSE requirements and L8 ACoP (HSG 274)	All HSE monitoring sheets given to the Clerk. Cross reference this with the Water Table		
	There is a point of use with wash hand basin in the old doctors room. The water is not used in this room and creates a Dead Leg which means it harbours water in the system and can cause a backflow of contaminated water back into the mains water system.	Immediately put this onto a flushing regime and flush weekly or and remove the whb and pipework back to the main pipework within the building.		
	The point of use hot water system in the disabled is reaching 60°C.			
	The burco kettle is fed through mains water.	Get the burco serviced and replace the blue tube bi annually		
	It is a legal requirement for the point of use hot water systems to be cleaned as they are over 10 litre capacity.	Either clean internally to remove limescale or replace. Keep the temperature above 60°C to kill any growing legionella		
	There is not a TMV in the disabled toilet where the point of use is. It is a Health and Safety legal requirement to have a TMV in a disabled toilet to stop scolding of the vulnerable.	Install a tmv in the disabled toilet.		
	The point of use in the kitchen is reaching less than 60°C.	Increase dial on front to reach 60°C.		
	The 2 power showers have plastic shower heads on them. The ladies shower on the shower head shows some limescale in the spray holes.	Clean internally if it can be dismantled. If not, replace the shower head and make sure not limescale is growing. Record all actions.		
	If the showers are not used this may create a dead leg.	Put on the flushing sheets provided.		

	Clean all limescale off spray taps.			
	There is an outside tap that needs to be used regularly	Flush when not used.		
	Awareness of legionella training has taken place.			Completed
	A TVC drinking water sample has been taken	The results show small amounts of coliform which are within the Drinking Water Inspectorate requirements. A recommendation for an annual sample has been made. Certificates with the clerk		
	The legionella sample has been taken but no results have come back yet.			

Domestic Water Outlets Hygiene Survey

Point of Use Water Heater	Location	Make Capacity	Temp
	Kitchen	Sector 10 litre Ariston	56°C
	Kitchen	Burco 8 Litre Kettle	
	Doctors surgery room	Under 5 litre compliance requirement but a dead leg.	
	Disabled Toilet	10 litre – Zip Aqua point II	63°C

Asset Register – Water Systems			
ASSET	IN PLACE	QTY	NOTES
Type of Domestic Cold Water System			
Mains Water Supply	Y	1	
Cold Water Storage Tanks	N		
Borehole	N		
Type of Domestic Hot Water System			
Gravity Fed without recirculation	N		
Gravity Fed with Recirculation	N		
Pressurised			
Domestic Hot Water Service			
Calorifiers	N		
Pressurised Unvented Hot Water	N		
POU Water Heater	Y	2	
Plate Heat Exchangers	N		
Electric Hot Water Boilers (point of use)	Y	1	
Plate heat exchangers	N		
Other System Assets			
Showers (Electric)	Y	2	
Showers (Mixed)	N		
Showers (Emergency)	N		
Wallgate Handwasher	N		
Thermostatic Mixing Valves	N		
Spray Taps	Y	2	
Domestic Hot and Cold Water Outlets	Y	13	
Drinking Water Outlets	Y	1	kitchen
Urinals	Y	1	
Toilets WC's	Y	4	
Water Softener	N		
Washing Machine	N		
Air Humidification	N		
Closed System F&E Tanks (heating)	N		
Closed System Chilled	N		
Swimming Pool	N		
Spa Pool	N		
Solar System	N		
Pumps	N		
Dish Washing Machines	Y	1	
Wash hand basins	Y	6	
Sinks	Y	1	

Pictures at Winterton Hall



Water Meter



Water Meter



Kitchen



Sink and WHB



Potential Dead Leg



Power Shower



Shower Head



Outside tap

Information Disclaimer

The survey was carried out on parts of the site which were made accessible to the surveyor. Water systems that may be located in parts of the building which were not highlighted to the surveyor, are not included in this risk assessment and exclusion of these systems does not indicate absence.

Whilst every endeavor is made in order to ascertain the correct information regarding the site layout and system plant information, the surveyor must rely on site staff knowledge and any available system drawings. Lack of such knowledge or information may lead to assumptions on the part of the surveyor and will be stated as such in the risk assessment.

Water systems may contain hidden deadlegs (e.g. above ceilings, behind walls or below floors) which may not be evident within the practical limitations of a site assessment. Total inspection of a system is not practical as it may require partial dismantling of floors, ceilings and other building fabric. This assessment is based on inspection of readily visible parts of water systems only, together with information from available system drawings and other documentation.

Signed

Dee Thornton

Dee Thornton
Valens Water
8th March 2022