



# **Brentwood Borough Council Housing Department Water Hygiene Management Policy**

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## 1. Policy Statement

Brentwood Borough Council Housing Services has a responsibility to protect employees, residents, members of the public and others from the risk of Legionella infection by virtue of its' operations or services arising from plant, equipment, facilities, work or work-related activities, acts or omissions. It will implement the procedures described in this document to ensure that this responsibility is met.

## 2. Statutory Requirements

Duties under the Health and Safety at Work etc Act 1974 (HASWA) extend to risks from legionella bacteria, which may arise from work activities. The Management of Health and Safety at Work Regulations 1999 (MHSWR) provide a broad framework for controlling health and safety at work. More specifically, the Control of Substances Hazardous to Health Regulations 2002 (COSHH) provide a framework of actions designed to assess, prevent or control the risk from bacteria like Legionella and take suitable precautions. Refer to Appendix 1 for further information.

The Approved Code of Practice (ACOP) 'Legionnaires' Disease - The control of Legionella bacteria in water systems (L8)' gives advice on how to comply with the relevant legislation and it is the intention of this policy to comply in full with that document and its associated guidance documents HSG 274 parts 2 and 3.

## 3. Introduction to Legionella Bacteria

Legionnaires' disease (Legionellosis) is a potentially fatal form of pneumonia and everyone is susceptible to infection. The risk increases with age, but some people are at higher risk including:

- people over 45 years of age
- smokers and heavy drinkers
- people suffering from chronic respiratory or kidney disease
- diabetes, lung and heart disease
- anyone with an impaired immune system

The bacterium Legionella Pneumophila and related bacteria are common in natural water sources such as rivers, lakes and reservoirs, but usually in low numbers. They may also be found in purpose-built water systems such as cooling towers, evaporative condensers, hot and cold-water systems and spa pools.

If conditions are favourable, the bacteria may grow increasing the risks of Legionnaires' disease and it is therefore important to control this risk

Legionnaires' disease is contracted by inhaling small droplets of water (aerosols) suspended in the air. Certain conditions increase the risk from legionella if:-

- the water temperature in all or some parts of the system may be between 20-45 °C, which is suitable for growth,
- it is possible for water droplets to be produced and if so, they can be dispersed,
- water is stored and/or re-circulated,

- there are deposits that can support bacterial growth, such as rust, sludge, scale, organic matter and biofilms.

#### 4. Purpose and Scope

This Policy sets out the strategy that Brentwood Borough Council will follow and describes the framework of procedures for achieving and maintaining it. This framework describes the objectives at each stage, specifies the management, operational and specialist responsibilities, and lays down a clear management and communication structure to ensure that it is effective and that it fails safe wherever practicable.

#### 5. Management and Responsibilities

The Brentwood Borough Council property portfolio currently comprises approx.3000 properties with a mix of residential lets (tenanted and leasehold properties),

The following sets out levels of responsibility for risk management of Legionella across the organisation:

##### 5.1 Duty Holder

The duty holder is accountable in law for the implementation of all aspects of Health and Safety legislation in the UK. The Duty Holder has chosen to appoint a Deputy Duty Holder to act on their behalf to oversee the management of Legionella control within the Housing Directorate for Brentwood Borough Council.

The Duty Holder is: **Chief Executive - Jonathan Stephenson**

Address: Town Hall, Ingrave Road, Brentwood, CM15 8AY  
Telephone: 01277 312500  
Email: [jonathan.stephenson@brentwood.gov.uk](mailto:jonathan.stephenson@brentwood.gov.uk)

##### 5.2 Deputy Duty Holder

The Deputy Duty Holder is accountable in law for the implementation of all aspects of Health and Safety legislation in the UK. The Duty Holder has chosen to appoint Delegated Duty Holders to act on their behalf to oversee the management of Legionella control within the Housing Directorate for Brentwood Borough Council.

The Deputy Duty Holder is: **Chief Operating Officer - Steve Summers**

Address: Town Hall, Ingrave Road, Brentwood, CM15 8AY  
Telephone: 01277 312500  
Email: [steve.summers@brentwood.gov.uk](mailto:steve.summers@brentwood.gov.uk)

### 5.3 Delegated Duty Holder

The Delegated Duty Holder has a responsibility to support this policy by ensuring the allocation of resources including an adequate budget, suitable and sufficient equipment, personnel, time and training.

In particular they will:

- Ensure Implementation and the continuing review of this policy
- Ensuring that the 'Duty of Care' to our tenants, employees and contractors is robust
- Ensuring that all employees are kept fully informed of developments, legislation and good practices relating to the management of legionella
- Identify and assess sources of risk
- Eliminate risk where possible
- Appoint appropriate 'Responsible Persons' to oversee, control and coordinate the control of the risk of Legionella
- Keep suitable records
- Ensure that there are adequate resources available to control the risk of Legionella

The Delegated Duty Holder is: **Interim Director for Housing & Enforcement - Tracey Lilley**

Address: Town Hall, Ingrave Road, Brentwood, CM15 8AY

Telephone: 01277 312500

Email: [tracey.lilley@brentwood.gov.uk](mailto:tracey.lilley@brentwood.gov.uk)

### 5.4 Responsible Persons

The Responsible Persons have the authority to put into effect such measures as are required to control the risk of Legionellosis, both as a matter of routine and in the event of a crisis. The Responsible Persons have a duty to ensure that ACOP L8 and all relevant legislation associated with the management and control of Legionellosis are adhered to. The Responsible Persons also have a responsibility to ensure records are kept confirming that this policy has been implemented.

The Responsible Persons will maintain records for all site-based activities as defined by the Written Scheme of Precautions, which may include logs of all visits by contractors, advisors and auditors, flushing and cleaning regimes.

The Responsible Persons are required to ensure that those persons specifically appointed to implement the control measures are suitably informed, instructed and trained to carry out the prescribed task on their behalf and to arrange the procurement of competent help, as required, including ensuring that the organisations and individuals deployed are competent and appropriately trained and experienced.

In particular they will:

- Ensure implementation and the continuing review of this policy
- Ensuring that the 'Duty of Care' to our tenants, employees, contractors and visitors is robust, on behalf of the Duty Holder
- Oversee the control and management of Legionellosis on behalf of the Duty Holder
- Ensure that Legionella risk assessments are carried out on behalf of the Duty Holder
- Eliminate risk where reasonably practicable
- Control risk where elimination is not reasonably practicable, by devising and implementing a scheme of precautions
- Arrange maintenance, monitoring and management of the precautions controlling the risk, including reviewing the risk assessment if there has been any material change
- Arrange the procurement of competent help, as required, including ensuring that the organisations and individuals deployed are competent and appropriately trained and experienced
- Receive service reports and priority corrective action notifications from the Competent Contractors
- Keep records

The Responsible Persons are:

**Housing Manager - Nicola Marsh**

Address: Town Hall, Ingrave Road, Brentwood, CM15 8AY  
 Telephone: 01277 312500  
 Email: [Nicola.marsh@brentwood.gov.uk](mailto:Nicola.marsh@brentwood.gov.uk)

**Compliance Manager - Keith Peirson**

Address: Town Hall, Ingrave Road, Brentwood, CM15 8AY  
 Telephone: 01277 312500  
 Email: [keith.peirson@brentwood.gov.uk](mailto:keith.peirson@brentwood.gov.uk)

**5.5 Competent Repairs and Maintenance Contractor**

Brentwood Borough Council will only employ a suitably qualified specialist contractor to undertake a range of Repairs and Maintenance functions including those relating to water hygiene. This will include but is not limited to the appointment and supervision of the Water Hygiene Contractor. The Competent Repairs and Maintenance Contractor provides the interface between the Water Hygiene Contractor and the client ensuring that sample results, monitoring reports, recommendations and advice are relayed to the Clients' Responsible Managers

The current Competent Repairs and Maintenance Contractor is: **Axis Europe**

Contact: Alan Noble, Divisional Manager  
 Address: 3, Tramway Avenue, London, E15 4PN  
 Telephone: 07799 536004  
 Email: [alan.noble@axiseurope.com](mailto:alan.noble@axiseurope.com)

Contact: Phillip Walker, Project Manager  
Address: 3, Tramway Avenue, London, E15 4PN  
Telephone: 07710 603904  
Email: [phillip.walker@axiseurope.com](mailto:phillip.walker@axiseurope.com)

## 5.6 Competent Water Hygiene Contractors

Brentwood Borough Council will employ, suitably qualified specialist contractors to undertake a range of water hygiene functions. This will include, but is not limited to, periodic water quality sampling and testing, temperature monitoring, servicing of thermostatic mixing valves (TMV's) and preparation of risk assessments, schematic drawings of water systems and Written Schemes of Precautions. They may also provide technical advice and training. All activities to be carried out as recommended in document L8 and specified in detail within the quotation and purchase order documents.

Records maintained by the Responsible Persons include those of testing and inspection activities undertaken by the Competent Water Hygiene Contractor and works to water systems undertaken by other contractors employed by Brentwood Borough Council Housing Services.

The Competent Water Hygiene Contractor records are created electronically on Socius and are displayed on a secure web page to which access has been established for the Responsible Persons and Competent Repairs and Maintenance Contractor.

The current Competent Water Hygiene Contractor is: **HSL Compliance Ltd**

Contact: Phil Hall, Account Manager  
Address: 3<sup>rd</sup> Floor Cornelius House, 170/180 Church Rd, Hove, East Sussex BN3 2DJ  
Telephone: 0845 604 6729  
Email: [phil3@hsltd.com](mailto:phil3@hsltd.com)

## 6. Brentwood Borough Council Owned and Maintained Accommodation

### 6.1 Multi-Occupancy Buildings

Where several duty holders share the use of the building, the duty holder who has control of the premises for work-related activities or the water systems within the building, has a responsibility to persons who may not be their employees, but who use the building. The extent of the duty will depend on the nature of the agreement; therefore, Director/Manager or a third-party duty holders must agree who will be responsible for ensuring that water systems comply with the Legionella ACOP and guidance, COSHH and any other relevant legislation. Leaseholders including Housing Associations have defined responsibilities within the lease agreement to maintain water systems within the demised premises. A suitable and sufficient assessment must therefore be carried out to identify, assess and properly

control the risk of exposure to legionella bacteria from onsite activities and the water systems in the building.

## **6.2 Housing Stock including Houses of Multiple Occupancy (HMOs)**

Brentwood Borough Council Housing Department owned properties let to housing tenants will be subject to Risk Assessment in accordance with this policy document

Tenants will be informed of the potential risk of exposure to legionella and its consequences and advised of any actions arising from the findings of the risk assessment, where appropriate. Tenants are advised to inform the Repairs and Maintenance team if the hot water is not heating properly or if there are any other problems with the system, so that appropriate action can be taken.

The 'Information guide' provided to all tenants will also advise tenants of the need to regularly clean and disinfect their showerheads

Brentwood Borough Council Housing Department will apply the following control measures to all housing properties

- flushing out the system before letting the property,
- avoiding debris getting into the system by ensuring the cold-water tanks, where fitted, have a tight-fitting lid
- setting the temperature of the water heaters to ensure water is stored at 60°C),
- appropriate monitoring programmes are implemented for all properties where there are water services within communal areas

## **7. Control Measures**

### **7.1 Risk Assessments**

Legionella Risk Assessments and schematic drawings will be carried out in full adherence to 'BS 8580-1:2019. Water Quality. Risk Assessments for Legionella Control. Code of practice', will be undertaken at all premises with installed water systems. These assessments will inform the need for any control measures, which will be detailed in Written Schemes of Precautions.

The Risk Assessment should also consider the following:

- Temperature of stored water, e.g. tanks, calorifiers, water heaters with header tanks etc
- Construction and dimensions of water storage tanks, calorifiers etc.
- Internal condition of water storage tanks and calorifiers (if possible)
- Water tanks are L8 and the water supply (water fittings) regulations 1999 compliant, e.g., screened overflows, insulation, lids
- Configuration of pipework to prevent water stagnation
- Dead legs in the pipework distribution system
- Condition of showers and showerheads
- Water temperatures at hot and cold outlets after specified running times

- Whether drinking water labels are installed to incoming mains (and conversely non-drinking water outlets also correctly labelled)
- Susceptible occupants, e.g., elderly, healthcare etc
- Legionella Pneumophila Bacterium (LPB) & TVC test sampling
- Identify where Thermal Mixing Valves (TMVs) are located on site

Due to the large numbers of individual properties within the portfolio then a risk-based approach will be adopted to ensure that all risk assessments are completed within a two-year rolling programme.

The priority ratings and rationale are detailed in Appendix 2 of this policy - for property types 1 - 3 then 100% of the accommodation will be accessed every 2 years unless there is a material change. For property types 4 - 7 then 10% of the accommodation will be accessed every 2 years unless there is a material change.

Risk Assessments are then to be reviewed on a yearly basis for Sheltered Schemes & HMOs, unless there is a change to the system in which case a new risk assessment will be carried out **and** in addition specifically whenever there is reason to suspect it is no longer valid. Examples include:

- Changes to the use of the building in which the system is installed
- The availability of new information about risks or control measures
- The results of checks indicating that control measures are no longer effective
- A case of legionnaires' disease associated with the system

Whilst the above timescales will be the standard, should we identify a high-risk action or have a positive sample of legionella identified, the Council will revert to a 100% survey of that particular block until the risk is suitable managed.

## **7.2 Written Schemes of Precautions**

Written Schemes of Precautions will be prepared for all properties to accompany the Risk Assessment. Such schemes will include schematic drawings of the water systems to show and identify the following components:

- All system plant, for example water softeners, filters, strainers, pumps, non-return valves and other outlets, for example, showers, wash-hand basins etc.
- All standby equipment, for example spare pumps
- All associated pipework and piping routes
- All associated storage and header tanks
- The origin of the water supply
- Any parts that may be out of use temporarily
- Sentinel / Sampling points

The Written Scheme will contain instructions for the operation of the system, in both normal and abnormal conditions to include the following:

- A description of the correct plant operation and any precautions to be taken.
- Details of any start-up and shut-down procedures, plant rotation and flushing requirements for little-used outlets.

- Where appropriate, details of methods statements, e.g. for major tasks such as cleaning operations
- Where appropriate, details of tests that are to be completed on the systems, along with the required frequency of the tests and the acceptable control parameters.
- Details of defects or out-of-parameter results, and logs of appropriate corrective actions.

### **7.3 Shutdown/Mothballing/Vacant (Void) Domestic Premises**

Where premises are not used for prolonged periods, they should not be occupied again until a re-commissioning process has been implemented. That process will be site specific and must be clearly specified before implementation

Vacant Domestic (Void) properties awaiting new tenants may be subject to weekly flushing as an alternative control measure. These actions will be recorded by the competent person delegated to undertake the task and saved in the shared drive.

### **7.4 Other Water Systems**

Cooling Tower Systems, Evaporative Condensers and Spa Pools are known to present risks with regards to the propagation of the Legionella bacterium. However, there are no installations of these types in any Brentwood Borough Council Housing Department properties.

External water features installed within the grounds of some estates and neighbourhoods will be subject to an appropriate risk assessment following which a suitable written scheme will be drawn up to control any risks as appropriate.

### **7.5 Disinfection**

Brentwood Borough Council adopts temperature control as its primary control measure, maintaining water temperatures and throughout, configuration and cleanliness to avoid conditions under which Legionella can proliferate. All water systems will be maintained to ensure as far as is reasonably practicable that cold water temperatures below 20°C and hot temperatures above 50°C are supplied to outlets. All stored hot water will be maintained at temperatures of 60°C or above.

Water services shall be disinfected in accordance with BS8558: 2015 in the following circumstances:

- New installations before being taken into use to remove contamination which may have occurred during construction or installation
- If a routine inspection, sampling or risk assessment shows it necessary to do so
- After any prolonged shutdown of a month or longer (a risk assessment may indicate the need for cleaning after a period of less than one month, especially in summer where temperatures have been high)
- If the system or part of it has been substantially altered or entered for maintenance purposes in a manner that may lead to contamination

- Following an outbreak or suspected outbreak of legionellosis or any other water borne infection/disease.

## **8. Emergency Management Procedures**

The following procedures are to be followed in the event of the following occurrences:

### **8.1 Failing Temperature Control**

Where it has been recorded that the temperature control for water systems have fallen outside of the agreed parameters, the Responsible Persons in conjunction with the Competent Contractors will investigate and take appropriate action to remedy.

Where a one-off fault has been identified and the rectification has resulted in the correct temperatures being achieved, no further action will be taken. If temperature control consistently fails and the fault cannot be rectified the Responsible Persons will immediately instigate Legionella sampling to be carried out until the system fault can be rectified or until an approved alternative control measure has been implemented and shown to be working.

### **8.2 Legionella Bacteria Detected in a Water System**

Where a test for Legionella has been carried out and returned as positive then the Competent Contractors shall notify the Responsible Persons immediately to ensure they are aware. They will carry out further sampling in the building and its users to determine the next course of action which could be but not limited to, a complete flush through of the water system, pasteurisation of the water system, chlorination of the water system, alternative is dosing with Stabilised Silver Hydrogen Peroxide which is less aggressive and therefore less likely to create problems on installations in poor condition; or engineering solutions to remove potential problems to the system. The additional use of continuous biocide treatment and/or point of use filtration may also be considered on a temporary or permanent basis.

Where a positive result has occurred, sampling for the Legionella bacteria will be repeated following remedial works to confirm that those works have resolved the issue. Three successive clear/negative sample results will need to be returned before the issued can be considered resolved. A further failure at this time will necessitate that this procedure be repeated.

### **8.3 The Escalation Process for Legionella**

Action levels following legionella sampling in hot and cold-water systems will follow this escalation process:

Legionella bacteria (cfu/l)	Action Required
1 -100 cfu/l  100 to 1000 cfu/l	<ul style="list-style-type: none"> <li>■ if the minority of microbiological samples are positive, the system should be resampled. If similar results are found again, a review of the control measures and risk assessment should be carried out to identify any remedial actions necessary.</li> <li>■ if the majority of microbiological samples are positive, the system may be colonised, albeit at a low level. An immediate review of the control measures and risk assessment should be carried out to identify any other remedial action required. Isolation, including taking water system or outlet out of use and disinfection of the system should be considered and implemented. Retest will be undertaken at 3 days. Continue sampling until 3 consecutive clear samples are obtained. Inform the Water Hygiene Steering Group.</li> </ul>
>1000 cfu/l	The system should be resampled, and an immediate review of the control measures and risk assessment carried out to identify any remedial actions, including isolation, including taking water system or outlet out of use and disinfection of the system should be considered and implemented. Retesting should take place 3 days after disinfection and at frequent intervals afterwards until a satisfactory level of control is achieved and 3 consecutive negative/clear samples are obtained. Inform the Water Hygiene Steering Group and sample again at 3 monthly intervals.
	The disinfection of a water system is normally based on chlorine being dosed at 50 ppm for a minimum contact period of one hour, at the end of which the concentration should not be less than 30 ppm free residual chlorine. However, lower concentrations and longer contact times are considered acceptable, as set out in BS 8558. For systems in poor condition or when otherwise advised by the contractor, an alternative chemical dosing regimen i.e. Silver Hydrogen Peroxide may be used.
	Other disinfectants may be used where they are shown to be effective. Their intended application should take into account the type of system and user profile at the specified concentration levels and contact period. If the disinfectant is for use in water systems supplying wholesome water, then these must comply with the requirements of The Water Supply (Water Quality) Regulations 2000.
The Council's Corporate Health and Safety Advisor, Responsible Persons and Duty Holders must be notified <u>immediately</u> , in the event that the Escalation Process for Legionella is instigated. This will be reported to the Water Hygiene Steering Group.	

## 9. Site Logbook/Record Keeping

Appropriate records of all risk assessments, tests, inspections and works to water systems must be kept for a minimum period of five years. This is to include records of all activities described in the Written Scheme of Precautions for each site.

Generally, records will fall into two categories: those associated with activities undertaken by the Competent Contractors and those for activities undertaken by the Designated Person and other on-site staff.

The site logbook will contain the following information:

- Full site address - Name of site contact (Managerial)

- Name of risk assessor and the company name
- Name of responsible person for BBC
- Date of assessment - Schematic drawing of domestic hot and cold-water storage system and associated pipework
- Photographic evidence of any pipework defects, condition of water tanks, calorifiers
- Details of microbiological sample results -
- Detail of operation relevant to controlling the risk
- The Written Scheme of Precautions
- Controls to be implemented complete with schedule
- Records of the weekly monitoring of Little Used Outlets
- Records of the Competent Water Hygiene Contractor monthly, quarterly, six monthly and annual monitoring of water systems

### **9.1 Record Keeping**

Records of all applicable training will be held by HR and designated Training Records file held on the Health and Safety Corporate Drive.

Records of Legionella sampling, chlorination and disinfection will also be held on Keystone and SharePoint

## **10. Vulnerable Groups & Scalding**

### **10.1 Scalding Risk Groups**

A risk assessment should be carried out to identify potential scalding risks from hot water outlet temperatures where vulnerable persons have been identified e.g. children, elderly persons, people with disabilities or those with sensory loss who have access to bathing and washing facilities and may not be able to recognise high water temperatures and respond quickly enough to prevent scalding themselves. Where the risk assessment warrants it, engineering controls should be provided that ensure either:

- water is delivered to the bath/shower outlet at no more than 44°C or
- water is prevented from being discharged at hotter than 44°C from taps, which may be accessible to vulnerable service users - the fitting of thermostatic mixing valve (TMV) or thermostatically controlled shower with upper temperature limit of 41-43°C will therefore be necessary.
- ensure that where possible the release of water spray is properly controlled
- ensuring water cannot stagnate anywhere in the system by regular movement of water in all sections of the systems and by keeping pipe lengths as short as possible and/or removing redundant pipework and dead legs.
- avoiding using materials that harbour bacteria and other microorganisms or provide nutrients for microbial growth
- keeping the system and the water in it clean

## 10.2 Annual TMV Service

Where there is a risk of scalding to service users, especially the young, infirm or elderly then provision based on a risk assessment will be made for the installation of thermostatically controlled devices to limit the temperature of the water to which they are exposed. Where such devices are installed, they will be maintained on a frequency defined by the risk assessment taking account of any manufacturer's instructions. Records of Thermal Mixing Valves (TMV's) maintenance will be held on Keystone<sup>1</sup> and annual servicing carried out.

An annual service of the TMV should be carried out by a competent contractor to ensure the TMV is working at the correct temperature and potential limescale build up is removed.

## 11. Training

Brentwood Borough Council officers and others acting on their behalf must be competent to undertake the tasks associated with their specified duties and responsibilities. This will be demonstrated by ensuring that the minimum levels of training described below are undertaken by the relevant duty holder.

### **Duty Holders & Responsible Persons**

City & Guilds or equivalent Accredited Responsible Persons Course

**All other Designated Officers including Surveyors, Repairs Team and other Staff engaged in implementing control measures e.g. Weekly flushing, etc.**

City & Guilds or equivalent Accredited Legionella Awareness Course and additional in-house training for specific properties where required.

### 11.1 Review Periods

All training is to be reviewed at intervals not exceeding two years.

## 12. Monitoring and Auditing

12.1 The management of Legionella in residential Council premises is the responsibility of the Directors, Managers or the appointed responsible persons in control of the building(s). This responsibility will be monitored via the Water Hygiene Steering Group.

12.2 The Corporate Health & Safety Advisor and Compliance Manager will audit building logbooks quarterly, to ensure the required level of monitoring is being carried out, as dictated by the written scheme. The results of this monitoring and auditing will be reported to the Water Hygiene Steering Group.

12.3 As part of the Council's compliance checks the Corporate Health and Safety Advisor will review the Council's Legionella Management Policy and Procedures

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<sup>1</sup> Keystone is BBC's Asset Management Database which records both the assets for investment and risk purposes as well as all servicing and inspection regimes.

for the management and control of Legionella risks. An annual report will be presented to the Water Hygiene Steering Group and the Health and Safety Committee. The report will confirm the level of compliance with the required checks and monitoring systems within Housing premises and will also consider if the Legionella Management Policy and arrangements are appropriate and effective. Where necessary the report will recommend actions necessary to improve compliance. This will not only provide assurance that the Council is complying with its statutory responsibilities but will also demonstrate that the roles of the Duty Holders, Responsible Person, Appointed and Nominated Persons are being correctly and effectively undertaken.

### **13. Monitoring of Legionella**

13.1 There may be additional works to be carried out following any health and safety monitoring carried out at specific premises in respect of microbiological sampling for legionella for hot and cold-water services, showers, air conditioning etc. Depending on the type of service installed, please refer to the HSE's Inspection Frequencies table, (Appendix 6) on how often testing is required to be carried out. Current copies of water testing inspection documents must be held either on site or centrally in electronic format for inspection purposes. Appropriate monitoring regimes will be established for the regular inspection of such systems and testing of water temperatures undertaken by the competent water hygiene contractor.

13.2 Legionella monitoring should be carried out where there is doubt about the effectiveness of the control regime or it is known that recommended temperatures, disinfectant concentrations or other precautions are not being consistently achieved throughout the system. The risk assessment should also consider where it might also be appropriate to monitor in some high-risk situations, such as Sheltered Housing premises or where water tanks or showers are used.

13.3 The circumstances when monitoring for legionella would be appropriate include:

13.4 Water systems treated with biocides where water is stored, or distribution temperatures are reduced. Initial testing should be carried out monthly to provide early warning of loss of control. The frequency of testing should be reviewed and continued until such a time as there is confidence in the effectiveness of the regime,

13.5 Water systems where the control levels of the treatment regime, e.g. temperature or disinfectant concentrations, are not being consistently achieved. In addition to a thorough review of the system and treatment regimes, frequent testing, e.g. weekly, should be carried out to provide early warning of loss of control. Once the system is brought back under control as demonstrated by monitoring, the frequency of testing should be reviewed,

13.6 High-risk areas or where there is a population with increased susceptibility, e.g. in Sheltered Housing, monitoring will be undertaken on a weekly and monthly basis.

13.7 If water systems are suspected or identified in a case or outbreak of legionellosis where it is probable the Incident Control Team (Health & Safety Executive (HSE), Public Health England (PHE)) will require samples to be taken for microbiological sampling for Legionella, the Corporate Health & Safety Advisor will investigate and report findings, to the Duty Holders, Responsible Persons and Water Hygiene Steering Group.

13.8 Where monitoring for legionella is considered appropriate in hot and cold-water systems, sampling should be carried out in accordance with BS 7592 'Sampling for Legionella organisms in water and related materials. The complexity of the system will need to be taken into account to determine the appropriate number of samples to take. A competent contractor will undertake the sampling and advise on the outcome and required actions. Reference should be made to the HSE guidance document HSG 274 as cited below.

13.9 The Escalation Process for Legionella following water sampling is given in Section 8.

#### **14. Reporting of Legionella Incidents**

Legionnaire's disease is reportable under Reporting of Injuries, Diseases and Dangerous Occurrence Regulations (RIDDOR) as an occupational disease. If two or more persons in a geographical area that are using the Council properties is found to have contracted legionnaires disease, it must be reported under RIDDOR (please refer to the Council's Incident Reporting Form) and contact the Corporate Health and Safety Advisor.

#### **15. Other Hazards that could be created by the Management of Legionella**

Consideration should be given to other health and safety hazards that could be created as the direct result of managing legionella. For example:

- the chemicals required to treat water systems may require a COSHH risk assessment and a copy of the Material Safety Data Sheet which should be retained and made available to any emergency service i.e. Ambulance or Fire Service. Copies of these will be retained by the Council and the Contractor before work commences.
- access to water systems may require work at height on a roof or work in confined spaces etc. these types of activities and their associated hazards should be taken into account within the risk assessment process and a suitable method statement written to document how to safely manage the activity. Copies of these will be retained by the Council and the Contractor before work commences.

#### **16. Policy Audit and Review**

The Duty Holders and Responsible Persons have overall responsibility for taking all reasonable steps to ensure that this policy is complied with.

The policy will be formally reviewed following any material change to the arrangements for its management or implementation. This is to include changes to key personnel including the Duty Holder or Responsible Persons or a change of Competent Contractor.

### 16.1 Policy Review Record

Reviewed by:	
Review Date:	
Detail reasons for review and any changes made:	

Reviewed by:	<i>Name and position</i>
Review Date:	
Detail reasons for review and any changes made:	

Reviewed by:	<i>Name and position</i>
Review Date:	
Detail reasons for review and any changes made:	

## Appendix 1 - External Resources

### Legislation

- Health & Safety at Work etc. Act 1974,
- Control of Substances Hazardous to Health Regulations 2002 (as amended),
- Management of Health & Safety at Work Regulations 1999,
- Workplace (Health, Safety and Welfare) Regulations 1992
- Provision and Use of Work Equipment Regulations 1998
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- Pressure Systems Safety Regulations 2000
- Manual Handling Operations Regulations 1992
- Personal Protective Equipment at Work Regulations 1992
- The Water Supply (Water Fittings) Regulations 1999

### Approved Codes of Practice

- HSE's Approved Code of Practice L8 "Legionnaires Disease: The control of Legionella bacteria in water systems".

### Guidance

- HSG 274 Part 2. The control of legionella bacteria in hot and cold-water systems
- HSG 274 Part 3. The control of legionella in other risk systems
- HSG 282 The control of legionella and other infectious agents in spa pool systems
- BS 8580-1:2019 Water quality - Risk Assessments for legionella control - Code of Practice
- BS 8558:2015 Guide to the design, testing and maintenance of services supplying water for domestic use within buildings and their curtilages
- HSE Guidance -Controlling Legionella in Nursing & Residential Care Homes
- Health Technical Memorandum 04-01
- HSE EH40/2005 Workplace Exposure Limits
- Water Regulations Advisory Scheme (WRAS)

## Appendix 2 - Risk Assessment Prioritisation Matrix

A risk assessment for each property type below is expected to be finalised in the target completion time frame below:

Priority Rating	Property Type	Rationale	Frequency
1	Sheltered Accommodation (Category 1 & 2)	The vulnerability of users is potentially high and the properties likely to incorporate cold water storage tanks and water heaters that store more than 15 litres. Higher proportion of communal areas likely	Every 2 years unless there is a material change
2	Multiple Occupancy Blocks (HMO's)	The properties are likely to incorporate cold water storage tanks and water heaters that store more than 15 litres.	Every 2 years unless there is a material change
3	Smaller HMO's	Properties which could have low volume of stored cold and hot water storage plant but unlikely to have communal areas.	Every 2 years unless there is a material change
4	General Needs Accommodation	Potential for larger water systems with increased storage and users with unknown susceptibility	Every 2 years unless there is a material change
5	Individual Properties	Likely to have no communal water storage tanks, no water heaters storing in excess of 125-150 litres and no communal showers. These are properties where due to minimal storage, water turnover is high and risks at their lowest.	Every 2 years unless there is a material change
6	General Needs Block / No Communal Areas Standard Risk	Likely to have no communal water storage tanks, no water heaters storing in excess of 125-150 litres and no communal showers. These are properties where due to minimal storage, water turnover is high and risks at their lowest.	Every 2 years unless there is a material change
7	General Needs Dwelling Standard Risk	Likely to have no communal water storage tanks, no water heaters storing in excess of 125-150 litres and no communal showers. These are properties where due to minimal storage, water turnover is high and risks at their lowest.	Every 2 years unless there is a material change

### Appendix 3 - Additional Monitoring of Property Types -

The frequency of inspecting and monitoring the hot and cold-water systems will depend on their complexity and the susceptibility of those likely to use the water. The risk assessment should define the frequency of inspection and monitoring depending on the type of use and user.

The Table below provides a checklist for hot and cold-water systems with an indication of the frequency of inspection and monitoring.

<b>Summary of Housing Support Officers (HSO), Caretakers Inspections (Sheltered Accommodation &amp; HMO)</b>				
<b>Service</b>	<b>Frequency</b>	<b>Task</b>	<b>Required</b>	<b>Comments</b>
<b>HOT &amp; COLD WATER SERVICES</b>	Weekly flushing when in use	<b>Sheltered Accommodation</b> Taps & showers in guest & sleepover rooms, void flats, together with communal taps	HSO are responsible for the weekly flushing where necessary by running water through outlets for 5 to 10 minutes to thoroughly flush release of aerosols.	Record action in Logbook for each of the areas and the type of appliance maintained, i.e. Wash Hand Basin, Bath, Sink, Shower, or other fittings.
<b>HOT &amp; COLD WATER SERVICES</b>	Weekly flushing when in use	<b>Communal Block Areas -</b> Taps & showers in guest & sleepover rooms, void flats, together with communal taps	Caretakers are responsible for the weekly flushing where necessary by running water through outlets for 5 to 10 minutes to thoroughly flush release of aerosols.	Record action in Logbook for each of the areas and the type of appliance maintained, i.e. Wash Hand Basin, Bath, Sink, Shower, or other fittings.
<b>Garden Taps</b>	Weekly flushing when in use. Tap will be isolated during November - February	<b>Sheltered Accommodation</b> Any outlet not in regular use e.g. garden hoses.	HSO when in use. If they can be isolated during winter months with an isolation valve. This could be situated just before the kitchen tap therefore creating no deadleg.	If there is an isolation valve, before use, it requires flushing for 10 minutes by the water hygiene contractor before putting into summer constant use.
<b>Garden Taps</b>	Weekly flushing when in use. Tap will be isolated during November - February	<b>Communal Block Areas -</b> Any outlet not in regular use e.g. garden hoses.	Caretakers when in use. If they can be isolated during winter months with an isolation valve. This could be situated just before the kitchen tap therefore creating no deadleg.	If there is an isolation valve, before use, it requires flushing for 10 minutes by the water hygiene contractor before putting into summer constant use.

## **Appendix 4 - No Access Protocol**

### ***Risk Assessment - Access Gained***

The contractor will write to the resident at least 7 days before the proposed risk assessment or remedial action work date. The letter will inform the resident of the date the contractor will be carrying out either the risk assessment or remedial works. This will give the resident the option to contact Axis directly to change the appointment if not suitable (copy of each letter in Appendix 5).

When access is obtained (at any stage) to carry out the remedial works, a signed service visit report will be issued with supporting photographic evidence itemising the works carried out. These documents will be sent via email to Brentwood Borough Council.

### ***Risk Assessment - Access Not Gained***

If access is not obtained, the surveyor takes a photograph of the resident's door showing a date and time they have tried to gain access and hand delivers No Access Letter 1 and inform the Project Manager. A copy of the No Access Letter 1 and photograph must be sent to Brentwood Borough Council via e-mail as evidence.

The contractor adheres to the No Access Letter 1 and returns in 7 days. If no access, the surveyor hand delivers the No Access Letter 2 and takes a photograph of the resident's door showing a date and time they have tried to gain access.

'No Access' letters will be left after each visit if no access is gained and copies kept by the contractor. All access attempts and outcomes are reported to Brentwood Borough Council, recorded on Teams/Keystone and monitored through the Water Hygiene Weekly Meeting with the contractor.

Following the two failed written appointment letters, the contractor provides full details of access attempts and outcomes to Brentwood Borough Council by e-mail. The contractor records and evidences all the methods used to contact the resident and the outcomes in case legal action is pursued.

Following the required visits made by the contractors (the above) the process is then passed to Brentwood Borough Council Housing Department to attempt to gain access by posting No Access Letter 3 by Royal Mail tracked delivery to ensure the letter is signed for.

## **Appendix 5 - No Access Letters**

Please refer to example of letters:

- 5.1 Introductory Letter for Risk Assessment
- 5.2 No Access Letter 1 for Risk Assessment
- 5.3 No Access Letter 2 for Risk Assessment
- 5.4 No Access Letter 3 for Risk Assessment

DRAFT

## 5.1 - Introductory Letter



Introductory Letter



Address:.....

Date: .....

Dear Resident,

**Re: L8 Water Hygiene Risk Assessment**

Axis has been appointed by Brentwood Borough Council to carry out a Water Hygiene Risk Assessment on the whole housing estate which includes your property.

Brentwood Borough Council have a legal requirement to assess any risks in relation to water in accordance with the Approved Code of Practice L8 (fourth edition 2013) and British Standard BS8580:2010.

We will return in 7 days' time (from receipt of this letter) to gain a better understanding on the water services within your property. We would be very grateful of your cooperation in providing access. The visit should take no longer than 1 hour, and the working hours of the risk assessor are Monday to Friday 8am – 4.30pm.

All Axis engineers carry an identification badge, and this should be displayed at all times. If you believe this is not a genuine arranged visit, please contact 0208 221 3900.

We apologise in advance for any inconvenience that this visit may cause you. Should you have any queries in relation to the contents of this letter, please contact Axis directly on 01277 312 500 option 2, 2, 1, 2.

Thank you in advance for your co-operation in this matter.

Yours faithfully,

*Axis Customer Service Department*

Axis and HSL

*Brentwood Borough Council working in partnership with Axis*

Brentwood Borough Council Town Hall, Ingrave Road, Brentwood, Essex, CM15 8AY

## 5.2 - No Access Letter 1



1

1st No Access Letter



Address:.....

Date: .....

**Re: L8 Water Hygiene Risk Assessment**

Dear Resident,

Axis has been appointed by Brentwood Borough Council to carry out a L8 Water Hygiene Risk Assessment at your property.

An operative has been in your block to carry out the Risk Assessment on the water services. Unfortunately, on this occasion they were unable to gain access into your property. We will return in 7 days from the date of this letter. Brentwood Borough Council have a legal requirement to carry out a risk assessment in your property and would therefore be very grateful of your cooperation in providing access.

The visit should take no longer than 1 hour. The working hours of the risk assessor are Monday – Friday 8am – 4.30pm. It is imperative this visit is carried out and your assistance in the matter is appreciated.

Please contact Axis by dialling 01277 312 500 option 2, 2, 1, 2 to re-arrange an appointment.

All of the Axis engineers carry an identification badge, and this should be displayed at all times. If you believe this is not a genuine arranged visit, please contact 0208 221 3900.

We do apologise for any inconvenience that this visit may cause you. If you have any queries or concerns in respect of this visit, please contact Axis directly or your Housing Officer.

Thank you in advance for your co-operation in this matter.

Yours faithfully,

Axis Customer Service Department

Axis and HSL

**Brentwood Borough Council working in partnership with Axis**

Brentwood Borough Council Town Hall, Ingrave Road, Brentwood, Essex, CM15 8AY

### 5.3 No Access Letter 2



2nd No Access Letter



Address:.....

Date: .....

**Re: L8 Water Hygiene Risk Assessment**

Dear Resident,

Axis has been appointed by Brentwood Borough Council to carry out a L8 Water Hygiene Risk Assessment at your property.

An operative has been in your block to carry out the Risk Assessment on the water services. Unfortunately, on this occasion they were unable to gain access into your property. We will return in 7 days from the date of this letter. Brentwood Borough Council have a legal requirement to carry out a risk assessment in your property and would therefore be very grateful of your cooperation in providing access.

The visit should take no longer than 1 hour. The working hours of the risk assessor are Monday – Friday 8am – 4.30pm. It is imperative this visit is carried out and your assistance in the matter is appreciated.

Please contact Axis by dialling 01277 312 500 option 2, 2, 1, 2 to re-arrange an appointment.

All of the Axis engineers carry an identification badge, and this should be displayed at all times. If you believe this is not a genuine arranged visit, please contact 0208 221 3900.

We do apologise for any inconvenience that this visit may cause you. If you have any queries or concerns in respect of this visit, please contact Axis directly or your Housing Officer.

Thank you in advance for your co-operation in this matter.

Yours faithfully,

Axis Customer Service Department

Axis and HSL

**Brentwood Borough Council working in partnership with Axis**

Brentwood Borough Council Town Hall, Ingrave Road, Brentwood, Essex, CM15 8AY

## 5.4 No Access Letter 3



3rd No Access Letter



Tenants Name  
Scheme Address

Date: January 2020

**Re: L8 Water Hygiene Risk Assessment**

Dear

Axis has been appointed by Brentwood Borough Council to carry out a L8 Water Hygiene Risk Assessment at your property.

You have previously been contacted regarding this matter, but unfortunately our Risk Assessor has been unable to gain access to your property. It is very important that we complete this risk assessment within your property, and we would be grateful of your assistance with arranging a convenient appointment.

An operative will be in your block carrying out the Risk Assessment in 7 days from the date of this letter and will require access to your flat in order to complete the assessment. Brentwood Borough Council have a legal requirement to carry out a risk assessment in your property. The visit should take no longer than 1 hour. The working hours of the risk assessor are Monday – Friday 8am – 4.30pm. It is imperative this visit is carried out.

**Please note that if we are unable to gain access on this occasion then we will have no alternative but to inform your Housing Officer to start legal proceedings to gain access.**

If this appointment is inconvenient, please contact Axis by dialling 01277 312 500 option 2, 2, 1, 2 to re-arrange an appointment

All of the Axis engineers carry identification badge, and this should be on display at all times. If you believe this is not a genuine arranged visit, please contact 0208 221 3900.

We do apologise for any inconvenience that this visit may cause you. If you have any queries or concerns in respect of this visit, please contact Axis directly or your Housing Officer.

Thank you in advance for your co-operation in this matter.

Yours faithfully,

*Keith Peirson*

Keith Peirson  
**Compliance Manager**

*Brentwood Borough Council working in partnership with Axis*

Brentwood Borough Council Town Hall, Ingrave Road, Brentwood, Essex, CM15 8AY

Appendix 6

Health and Safety Executive (HSE)

Recommended Inspection Frequencies

General:

Service	Action to Take	Frequency
<p><b>Hot Water Services</b></p>	<p><b>For non-circulating systems:</b> take temperatures at sentinel points (nearest outlet, furthest outlet and long branches to outlets) to confirm they are at a minimum of 50°C within one minute.</p>	<p>Monthly</p>
	<p><b>For circulating systems:</b> take temperatures at return legs of principal loops (sentinel points) to confirm they are at a minimum of 50°C. Temperature measurements may be taken on the surface of metallic pipework</p>	<p>Monthly</p>
	<p><b>For circulating systems:</b> take temperatures at return legs of subordinate loops, temperature measurements can be taken on the surface of pipes, but where this is not practicable, the temperature of water from the last outlet on each loop may be measured and this should be greater than 50 °C within one minute of running. If the temperature rise is slow, it should be confirmed that the outlet is on a long leg and not that the flow and return has failed in that local area.</p>	<p>Quarterly (ideally on a rolling monthly rota)</p>
	<p><b>All hot water systems:</b> take temperatures at a representative selection of other points (intermediate outlets of single pipe systems and tertiary loops 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. Representative selection of other sentinel outlets considered on a rotational basis to ensure the whole system is reaching satisfactory temperatures for legionella control.</p>	<p>Representative selection of other sentinel outlets considered on a rotational basis to ensure the whole system is reaching satisfactory temperatures for legionella control</p>
<p><b>Calorifiers</b></p>	<p>Inspect calorifier 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</p>	<p>Annually, or as indicated by the rate of fouling</p>

Service	Action to Take	Frequency
	<p>Where there is no inspection hatch, purge any debris in the base of the calorifier to a suitable drain.</p> <p>Collect the initial flush from the base of hot water heaters to inspect clarity, quantity of debris, and temperature Annually, but may be increased as indicated by the risk assessment or result of inspection findings.</p>	<p>Annually, but may be increased as indicated by the risk assessment or result of inspection findings</p>
	<p>Check calorifier flow temperatures (thermostat settings should modulate as close to 60 °C as practicable without going below 60 °C). Check calorifier return temperatures (not below 50 °C).</p>	<p>Monthly</p>
<p><b>Point of Use (POU) Water Heaters (no greater than 15 litres)</b></p>	<p>Check water temperatures to confirm the heater operates at 50-60 °C (55 °C in healthcare premises) or check the installation has a high turnover.</p>	<p>Monthly to six monthly, or as indicated by the risk assessment</p>
<p><b>Combination Water Heaters</b></p>	<p>Inspect the integral cold-water header tanks as part of the cold-water storage tank inspection regime, clean and disinfect as necessary. If evidence shows that the unit regularly overflows hot water into the integral cold-water header tank, instigate a temperature monitoring regime to determine the frequency and take precautionary measures as determined by the findings of this monitoring regime.</p>	<p>Annually</p>
	<p>Check water temperatures at an outlet to confirm the heater operates at 50-60 °C.</p>	<p>Monthly</p>
<p><b>Cold Water Services</b></p>	<p>Check temperatures at sentinel taps (typically those nearest to and furthest from the cold tank, 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 one minute, observe the thermometer reading during flushing.</p>	<p>Monthly</p>
	<p>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. Peak temperatures or any temperatures that are slow to fall should be an indicator of a localised problem.</p>	<p>Representative selection of other sentinel outlets considered on a rotational basis to ensure the whole system is reaching satisfactory</p>

Service	Action to Take	Frequency
		temperatures for legionella control
	Check thermal insulation to ensure it is intact and consider weatherproofing where components are exposed to the outdoor environment.	Annually
<b>Cold Water Tanks</b>	Inspect cold water storage tanks and carry out remedial work where necessary.	Annually
	Check the tank water temperature remote from the ball valve and the incoming mains temperature. Record the maximum temperatures of the stored and supply water recorded by fixed maximum/ minimum thermometers where fitted.	Annually (Summer) or As indicated by the temperature profiling.
<b>Shower and Spray Taps</b>	Replace or dismantle, clean and de-scale removable parts, heads, inserts and hoses where fitted.	Quarterly or as indicated by the rate of fouling or other risk factors e.g. areas with high risk tenants (where known) in Sheltered Accommodation
<b>POU filters</b>	Record the service start date and lifespan or end date and replace filters as recommended by the manufacturer (0.2 µm) membrane POU filters should be used primarily as a temporary control measure while a permanent safe engineering solution is developed.	According to manufacturer's guidelines
<b>Base exchange softeners</b>	Visually check the salt levels and top up salt, if required. Undertake a hardness check to confirm operation of the softener.	
	Service and disinfect	Annually, or according to manufacturer's guidelines.
<b>Infrequently Used Outlets</b>	Consideration should be given to removing infrequently used showers, taps and any associated equipment that uses water. If removed, any redundant supply pipework should be cut back as far as possible to a common supply but preferably by removing the feeding 'T'. Infrequently used equipment within a water system (i.e. not used for a period equal to or greater than seven days) should be included on the flushing regime. 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	Weekly, or as indicated by the risk assessment

Service	Action to Take	Frequency
	growth in the peripheral parts of the water system, sustain and log this procedure once started.	
	For high risk populations, e.g. Sheltered Housing, more frequent flushing may be required as indicated by the risk assessment.	
<b>Thermostatic Mixing Valve (TMV)</b>	Risk assess whether the TMV fitting is required, and if not, remove. Where needed, inspect, clean, descale and disinfect any strainers or filters associated with TMVs. To maintain protection against scald risk, TMVs require regular routine maintenance carried out by competent persons in accordance with the manufacturer's instructions.	Annually or on a frequency defined by the risk assessment, taking account of any manufacturer's recommendations
<b>Air Conditioning Systems:</b>	Fixed Air Conditioning Inspected, disinfected and if required, cleaned if there is a significant change in operation status	Six Monthly
<b>Portable Air Conditioning</b>	Inspected, disinfected and if required, cleaned if there is a significant change in operation status such as laying dormant for a period of time.	Annually
<b>Water Softeners</b>	Clean and disinfect resin and brine tank - check with manufacturer what chemicals can be used to disinfect resin bed.	As recommended by the manufacturers
<b>Water Features</b>	Clean and disinfect ponds, spray heads, and make up tanks including all wetted surfaces, descaling as necessary.	As indicated by the risk assessment and depending on condition