

LEGIONELLA COMPLIANCE

<u>Action Required</u>	<u>Current Position</u>	<u>Gap</u>	<u>Remedial Action</u>
Identify and assess source of risk	This is done as part of the legionella risk assessment carried out by Property Services on behalf of Building Managers	Premises Property Services are not aware of. New premises Premises that undergo significant alterations that affect their water systems. Leased properties	Managers to be reminded of need to inform Property Services where they take on new buildings or alter existing buildings. CHSU & Directorate H&S Officers to inform Property Services if they become aware of nay premises not under existing contract. CHSU to carry out premises audits as part of audit programme to ensure Risk Assessments are in place, Building Managers are acting on the recommendations and that there are appropriate records in place. CHSU to publicise new buildings checklist and to develop a checklist for change of use Need to ensure clear contracts and that Landlord is aware of and discharges responsibilities.
Prepare a scheme of preventing or controlling the risk. The written scheme must include: <ul style="list-style-type: none"> - An up to date plan showing layout of the plant or systems, including parts (schematics) - A description of the correct and safe operation of the system - The precautions to be taken - Checks to be carried out to 	This is done as part of the legionella risk assessment carried out by Property Services on behalf of Building Managers Property Services have confirmed that the contracts for legionella risk assessment currently being put into place are based on CLAW (Consortium for Local Authority in Wales) specification, which is fully compliant with the requirement of L8 HSE's Approved Code of	Premises Property Services are not aware of. New premises Premises that undergoes significant alterations, which may affect the water systems.	As above

<p>ensure efficacy of scheme and the frequency of such checks</p> <ul style="list-style-type: none"> - Remedial action to be taken in the event that the scheme is not shown to be effective 	<p>Practise The Control of Legionella Bacteria in Water Systems.</p>		
<p>Implement, Manage and monitor precautions</p>	<p>Some of this is done by Property Services e.g. Quarterly, 6 monthly and annual checks. The risk assessment will however require premises specific actions</p>	<p>Quality checking of legionella risk assessment. This has previously been carried out informally however Property Services will formally quality check and record details of the quality check of a % of all legionella risk assessment completed.</p>	<p>Property Services to formally quality check a % of legionella risk assessments, to formally document this review and to report on the outcome. % to be agreed.</p>
		<p>Where the legionella risk assessment identifies items which require immediate action, this is passed to the Building Manager to progress. There is currently no formal loop to ensure that this high risk remedial work is actioned as a priority. ET met with AW and it was agreed Property Services would prepare a procedure for informing Directorate H&S Officers and CHSU who can monitor and report to DMT.</p>	<p>Property Services to develop a written procedure for notification and raising high risk issues. Procedure to go to H&S Professionals Group for approval.</p>
		<p>Lack of training/expertise of those required to action responsibilities. In terms of practicalities there are also training and risk factors to be considered e.g. many LA premises such as schools are large and complex, training would be required on how checks should be carried out, in some cases checks are</p>	<p>Building Managers training and refresher training. Training and refresher training for anybody carrying out checks required under the risk assessment. Premises risk assessment to ensure suitability of those carrying out checks taking into account risk groups.</p>

		required frequently and will be time consuming, those likely to carry out the checks would be in the risk groups e.g. middle aged men and there would also need to be a monitoring process to ensure what is needed is happening and is being recorded.	Consideration of automated systems to reduce the risk. ET to invite automated provider to give a presentation at H&S Professionals Group.
Keep records of the precautions	For the checks carried out by Property Services records would be kept. For other checks required following the risk assessment, checks generally not carried out.	For other checks required following the risk assessment, checks are in the main not done and not recorded.	See above. System to be put in place for all premises. Significant cost implication and likely need for Directorate specific approach. Auditing compliance as part of CHSU audit programme.
Appoint a person to be managerially responsible	This would be the Building Manager and this is covered by the mandatory Building Managers training	Building Managers not appreciating and/or acting on their responsibilities. Not having a clear understanding of what they should do and how. Not having sufficient expertise or budget to do the additional things required following the risk assessment.	Building Managers training. Refresher training. Re-issue guidance. Monitor and audit. Circulate CX letter and details of Barrow in Furness Report.