

# “Evicting” Legionella

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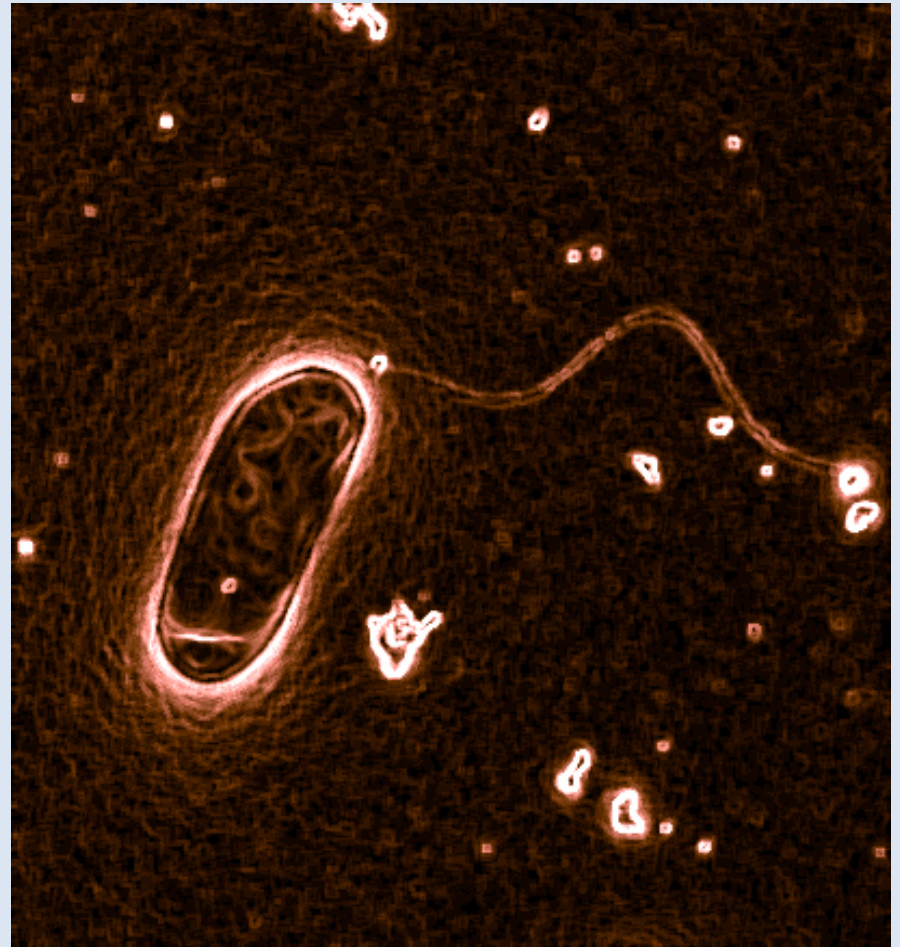
# Workshop Highlights



- Reviewing your current status
- Efficient use of resources
- Don't do too much or too little
- How drastic would eviction be?
- Strategy based on risk information
- Justify your strategy
- Email follow-up with guidance documents and training course details

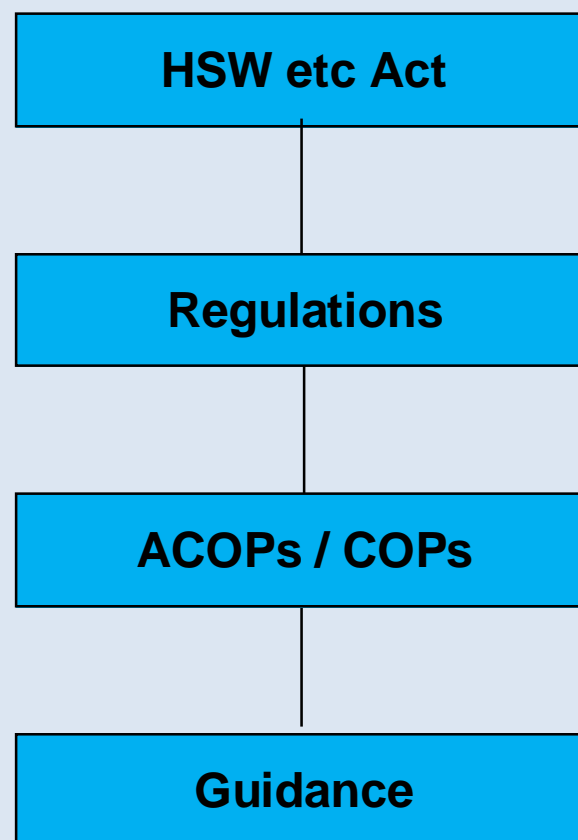
# Warm-Up

- Tenant's water systems contain Legionella now?
- Tenant's inhaled Legionella from your systems?
- Proportion of tenants who have had Legionnaires' disease?
- What matters?



# Legislation & Guidance

- COSHH
- HSC/HSE ACoP L8
- Essential Information for Providers of Residential Accommodation
- Etc



# Business Processes

- Acquisition – purchase, lease
- Design, refurbishment
- Void properties
- Merger of HAs
- Repair/maintenance
- Designate properties to types of resident
- Letting property



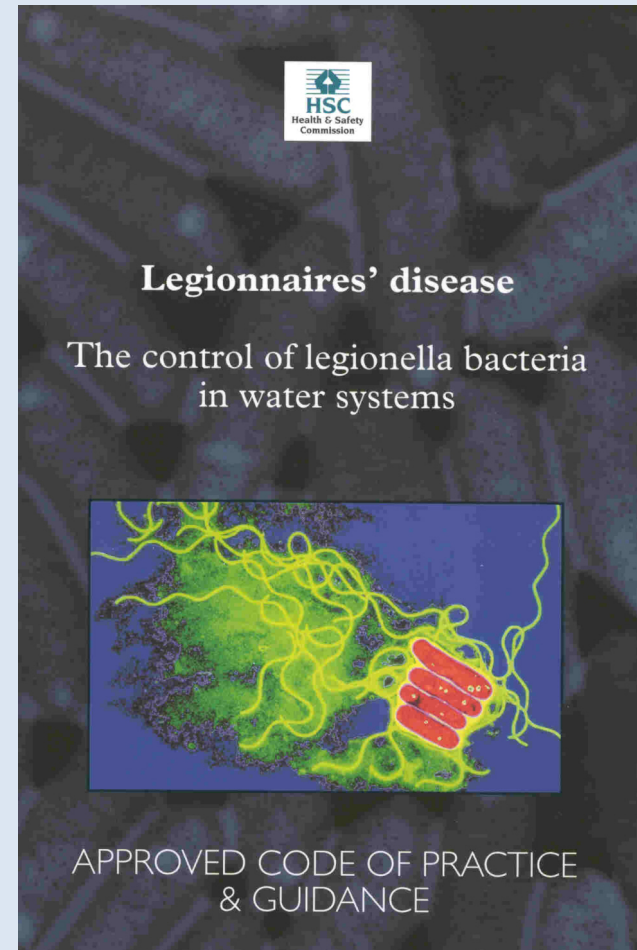
# HSW etc Act & COSHH

- Risk assessment
- Training
- Risk control hierarchy – starts with elimination, last is PPE



# Requirements – HSC/HSE ACoP/L8

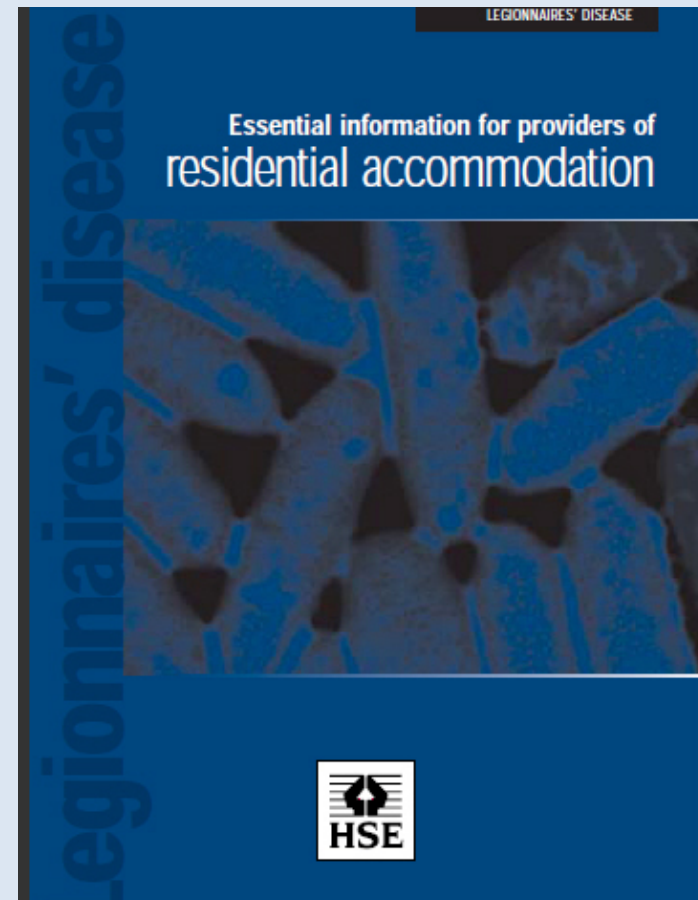
- Appoint a Responsible Person
- Identify hazards and assess risk
- Scheme for controlling risk
- Implement it
- Keep records



# Residential Accommodation Providers

## Who is Responsible?

- Service Level Agreement
- Eg Community home – Mental Trust or HA?
- Typically maintenance provider

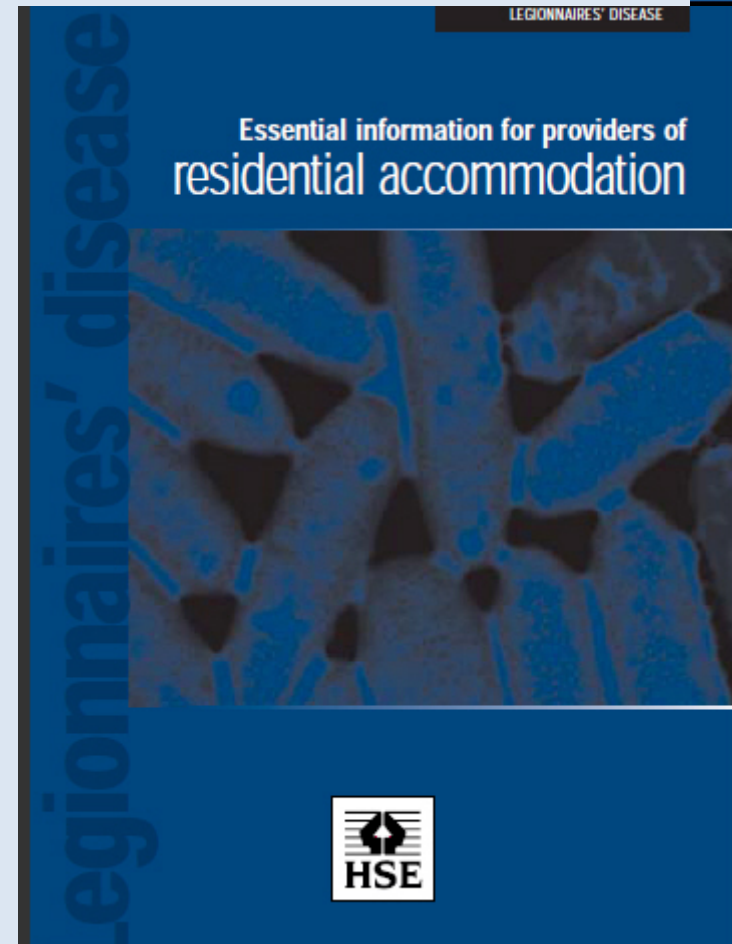


# Residential Accommodation Providers



## Information to tenants

- Issue comprehensive procedure? No way!!
- Report dirty water, hot water failure – to keep water “fresh”?



# Match Requirements to Business Processes

- Understand current position
- Development management system specific to your business processes
- Optimise your use of resources



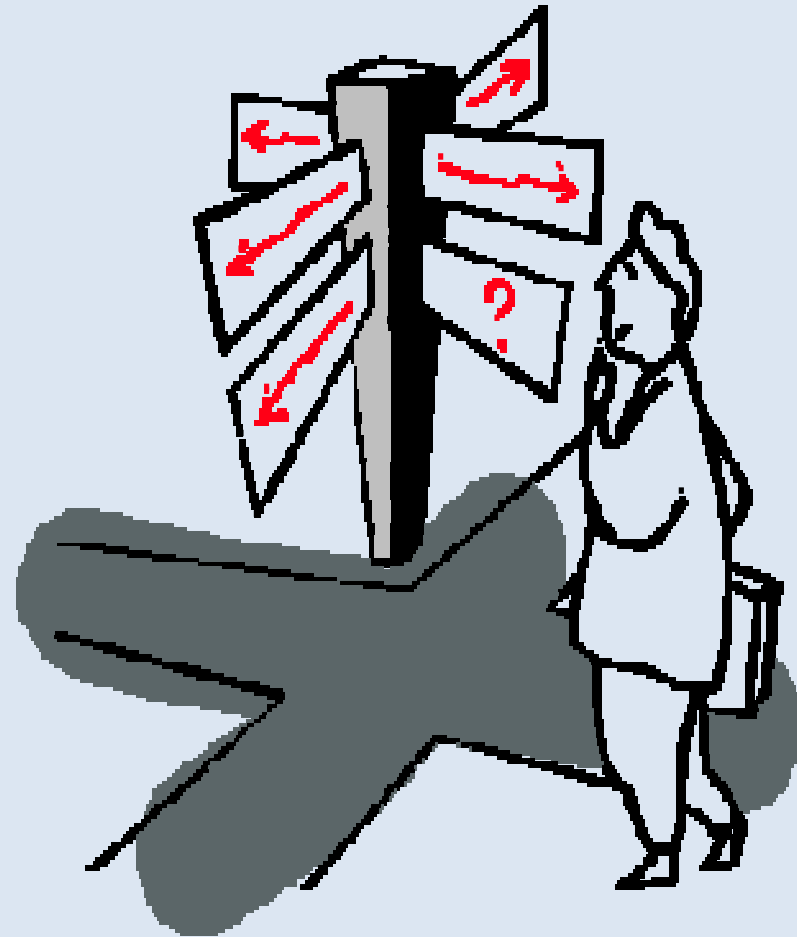
# Understand Current Position

Management system –  
how good is it?

- Find out – use audit

Technical/operational  
aspects of water  
systems – are they  
adequate?

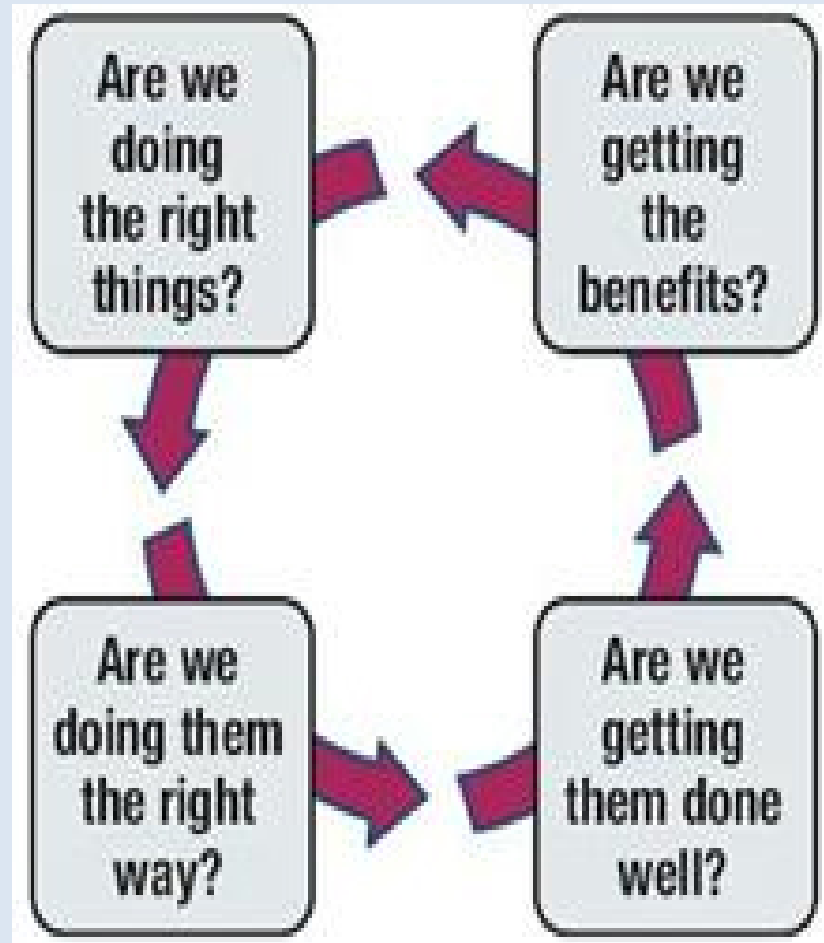
- Independent risk  
assessment



# Audit

Water Hygiene Centre legionellosis risk audit is unique because it focuses on:-

- 5 management requirements of HSE ACoP/L8
- Your business processes



# Risk Assessment

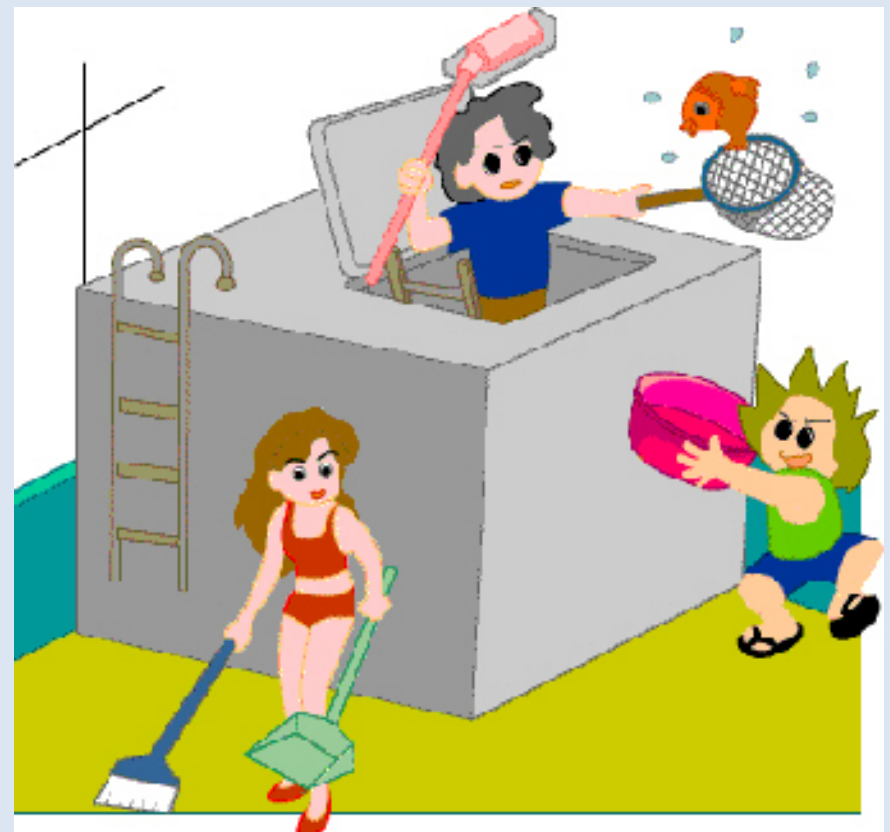
- Independent – use a consultant not a contractor
- Risk assessment is not just condition survey
- Water Hygiene Centre provides documented risk screen to focus risk assessment



# Cautionary Tale

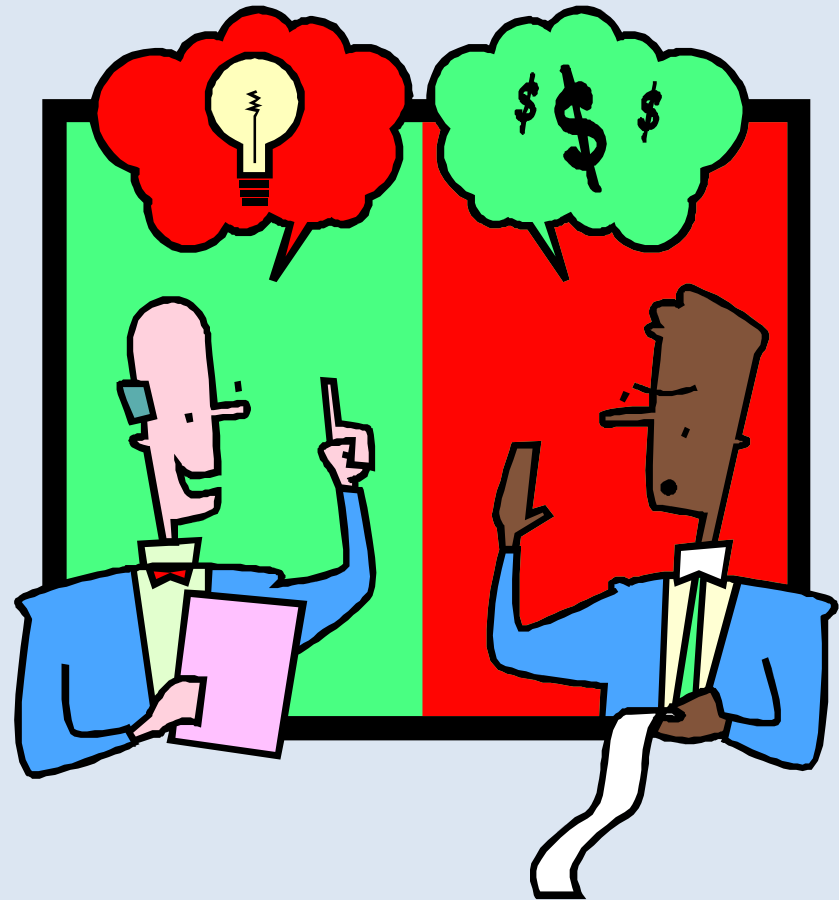
City Council Housing Dept

- “Risk assessment” by water treatment contractor
- Every cold water tank recommended to be cleaned £400K
- No recommendations for hot water
- £25K wasted on worthless “risk assessment”



# Reasonably Practicable

- 5 management requirements are “absolute”
- Technical/operational actions should be reasonably practicable
- Risk and cost must be balanced



# Risk Factors – Need Control

DESIGN, CONDITION, OPERATION,  
PERFORMANCE,  
VULNERABILITY, EXPOSURE, MANAGEMENT



# Assurance

- Duty Holder appoints & provides resources to Director or Snr Mgr as Responsible Person
- RP puts system in place
- Independent Authorising Engineer audits system
- RP improves system



# Legionella Sampling

For temperature  
controlled H&C water:-

- Not routine
- Not random
- Sample when control is lost, until it is restored



# How to Avoid Wasting Money

- Separate consulting and contracting
- Don't apply the same measures across all properties – take account of risk instead
- Don't pretend guidance is law, it isn't!



# How to Avoid Jail



- Document and implement a management system based on 5 issues
- Use external independent competent help
- Use external scrutiny via audit



# How Easy is Eviction of Legionella?

- Disinfection – does it work?
- Disinfection tackles symptoms not causes
- Find cause and eliminate – often multiple causes



# Next Steps?

- Responsible Person (and Authorised Person, Competent Persons) in place
- Independent Authorising Engineer appointed
- Training for RP, AP, CP
- Audit and revise system



# Free Information by e-mail



## Links to free documents:

- COSHH Regulations
- Legionnaires' disease: The control of Legionella bacteria in water systems. Approved Code of Practice and guidance (HSC/HSE publication).
- Legionnaires' Disease: Essential Information for Providers of Residential Accommodation (HSE publication).

## Training course information:

- Legionnaires' Disease: Role of the Responsible Person.
- Legionnaires' Disease: Role of the Authorised Person.
- Legionnaires' Disease: Role of the Competent Person.

# Thank you for your attention!

Any questions?

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