

Coronavirus (COVID-19)

Property Compliance Update

Managing **Legionella Risk** in Buildings



Cyngor **Sir Gâr**
Carmarthenshire
County Council



Advisory Note - Legionella UPDATE

Following on from our advisory note issued in March 2020 with regards to the 'Management of Legionella Risk in Buildings, this note is to provide an updated position statement. Following confirmation last week that the lockdown restrictions will remain in place and whilst await further guidance as to what is going to happen next, we will need to consider putting plans in place when the lockdown is officially eased and we can re-open/occupy the buildings.

The main issue in respect to Legionella Management is around partially closed buildings, particularly schools, and other buildings operating in reduced capacity and therefore we need to have robust procedures in place to address this risk. In respect to all properties, the Legionella guidance separates buildings into three categories:

1. those which are open with full occupation;
 2. those which are partially occupied;
 3. those which are unoccupied and have been shut for more than a month.
1. In respect to buildings that are fully opened and running as normal then the Premises Responsible Person must continue to undertake their normal activities/regimes in respect to your property inspections.
 2. In those building which have some or little occupancy, it's recommended to maintain normal control regimes (temperatures) as well as continuing to undertake the weekly flushing on **all outlets** and recording (see appendix a) this regime as detailed in the previous advisory note (see appendix b). These buildings can be reopened for full occupation when lock down is lifted as long that you can provide the evidence that the flushing regimes have been undertaken of all hot & cold outlets and that access has been given to 'HSL Compliance' our Water Management Contractor to undertake their normal monthly monitoring visits. Please note however, that if you have other risk systems present (such as spa pools, swimming pools etc), then further remedials such as disinfection and recommissioning is required before reopening these specialist systems.
 3. In buildings which have been unoccupied and shut for more than a month and the weekly flushing **hasn't** been undertaken, the risk of the proliferation of Legionella bacteria is high. These buildings must remain **closed until remedial actions have been undertaken**. The guidance recommends that a chemically disinfection of the hot and cold-water systems is undertaken and the collection of bacteria and legionella samples. These building can **only** be reopened when Property Compliance are satisfied that the hot and cold-water systems are within the controlled limits. Since these samples need to be incubated for up to 10 days at the laboratory, the disinfections would need to be scheduled at least two weeks prior to any planned reopening date, with outlets flushed regularly between the disinfection and reopening.

However, we are conscious that when the lockdown is eased there will be a significant demand for cleaning and disinfecting of water systems. Consideration therefore would be to conduct a clean and disinfection of your premises water system as soon as possible however, it will be essential that the flushing regime is re-introduced and continued to reduce stagnation until opening may be an option. Whatever category your building relates to you **must** complete the 'Property Compliance Questionnaire' sent to you via email from **Propertycomplianceunit@carmarthenshire.gov.uk**

In respect to Schools an e-mail has been sent to you from the Head of Education & Inclusion Services. All school **MUST** to click on the link via HWB, complete and return as soon as possible. This information is returned to the Senior Education Consultant for collation and sharing with the Property Compliance Unit to follow up.

If you have not received this document, then you must request this via this email address. Please complete the form and return. Once Property Compliance receive the completed form, they will be in contact to advise on the next course of action in respect to Property Risks.

Thank You

Jason Jones, Property Maintenance Manager

Appendix A

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Appendix B

Managing Legionella Risk in buildings (Open or Closed) over the COVID 19 Period

"In accordance with Government guidance and under the requirements of the Health and Safety at work Act the services provided by 'HSL Compliance' in relation to Water Hygiene are deemed critical services to the safe operation of your site and the importance in maintaining the flushing regimes of all little used outlets."

Many properties are closed or partially occupied over the COVID - 19 period and consequently the vast majority of hot and cold water outlets are no longer used.

If these outlets are left to stagnate when the ambient temperature will generally be at its warmest, then there is a significant risk that a legionella bacteria will proliferate in the pipe work and those who are first to use these outlets will almost certainly be exposed to legionella bacteria.

If one of these people happens to be a person with reduced immunity then they may acquire Legionnaires' disease.

The ACoP L8 is absolutely clear and states in paragraph 165 the following: **"When outlets are not in regular use, weekly flushing of these devices for several minutes can significantly reduce the number of legionella discharged from the outlet. Once started, this procedure has to be sustained and logged, as lapses can result in a critical increase in legionella at the outlet."**

Therefore, it is imperative where we can that caretakers carry out this weekly flushing regimes to all outlets that are not being used currently within their buildings. Please find a 'Little Used Flushing Method' on last page. (All Caretakers should be familiar with this process).

Clearly it can be seen that 'flushing on a weekly basis' and logging of that procedure is essential, which will have to be evidenced before any re-occupation of any buildings.

Consequently, 'HSL Compliance' should be provided access to the site in order to undertake their monthly service visit. Please ensure that their staff are fully briefed of any local or site-based restrictions that may apply due to Covid-19. HSL Compliance will also carry with them a copy of the 'Little Used Outlet Flushing Method of Work Statement' and the form for documenting the flushing.

If you need to contact 'HSL Compliance' to arrange a suitable time and date that you will be available to attend or discuss any aspect of Flushing Regime please do so by contacting either:

Owain Jones (HSL Compliance Monitoring Officer) - **07525 125327**

Gareth Phillips (HSL Compliance Monitoring Officer) - **07525 125328**

What about when I need to return to Normal Operation?

If buildings or water systems are isolated during the COVID-19 outbreak and the length of time involved may not have been known at the outset and control measures are not maintained and where staff may not have been available to flush to simulate usage it is unlikely that buildings can simply be reopened with no additional measures.

Start-up procedures for systems will need to be reconsidered before buildings can be reopened. Consideration will be given to water system cleaning and disinfection and/or controlled flushing to mitigate the risk from prolonged stagnation.