

LEGIONELLA COMPLIANCE KEY CONSIDERATIONS

An opportunity to consider key areas relating to legionella compliance in your property stock.

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INTRODUCTION

This document will take you through some key considerations for compliance with legionella legislation and guidance, it is not intended as an exhaustive gap analysis, instead it seeks to prompt discussion and thought in some key areas.

Should you need assistance with any of the topics raised in this document, please contact your Riverside project manager for help.

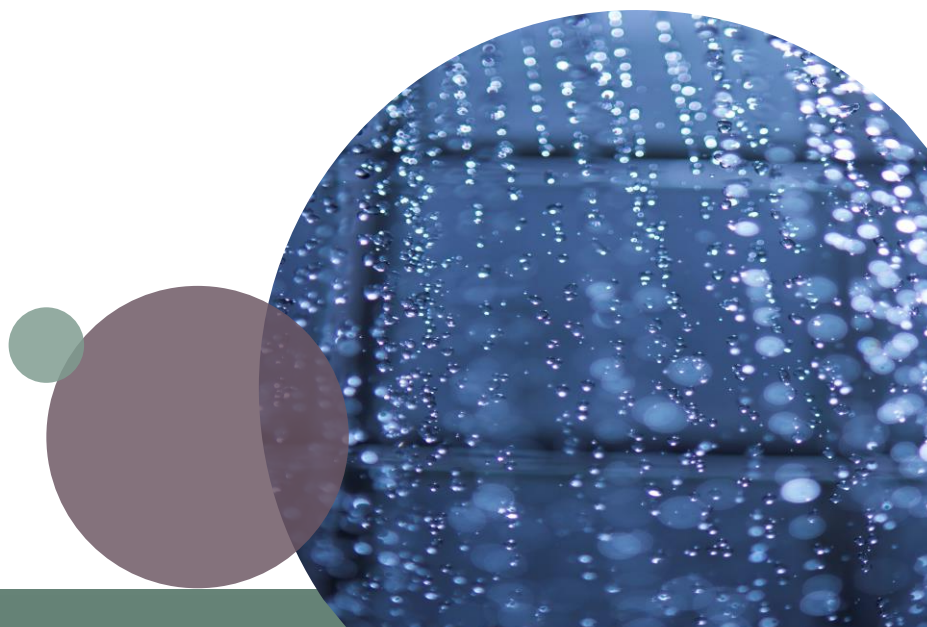
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LEGIONELLA MANAGEMENT TEAM

An effective management team is critical for ensuring all parts of the control scheme are successfully implemented.

KEY CONSIDERATIONS

- Have all roles been defined to control the risk from legionella in your properties?
- Have named competent individuals been allocated to these roles? Are they recorded in your log book(s) or legionella policy?

**Example common roles - duty holder, responsible person, compliance assistant/officer, independent legionella consultant (risk assessments, monitoring and sampling) and a separate remedial works contractor.*

HSE Definition of Competence

Competence can be described as the combination of training, skills, experience and knowledge that a person has and their ability to apply them to perform a task safely. Other factors, such as attitude and physical ability, can also affect someone's competence.



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MANAGEMENT POLICY

A comprehensive management plan/policy should describe all aspects of your arrangements to control the risk from legionella.

KEY CONSIDERATIONS

- Do you have a documented legionella control policy/management plan?
- Does it cover all aspects of management and accurately reflect your arrangements?
- Has it been reviewed recently to ensure it is appropriate and is being fully implemented?



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LOGBOOK (DATABASE)

Maintaining an up-to-date logbook is essential in management of legionella, often delivered through software technology.

KEY CONSIDERATIONS

- Do you have a logbook which summarises control measures, responsible people and the latest condition data? (paper, database, excel or another structure?)
- Are you confident in the quality of the data held? (for management and communication)
- Has a process been established to collect data from your legionella consultants and add it to your logbook? (i.e. manual upload or import/export facility)
- Is training provided where necessary on its use?

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LEGIONELLA COMMUNICATIONS

Information must be provided to all stakeholders in how to effectively manage the risk from legionella.

KEY CONSIDERATIONS

- Do you provide occupants with information on legionella safety and reporting issues?
- Do you share legionella information with internal stakeholders such as property managers, repairs or facilities teams (and similar)?
- Are site contact details kept up to date and shared with relevant contractors to facilitate access and communications?



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COMMON WORKSTREAMS

Applying these arrangements to your specific workstreams is critical in effectively managing legionella.

KEY CONSIDERATIONS

- Are all workstreams covered by your legionella arrangements?

**new installations, all assets, repairs, empty properties, properties with higher risk occupants, water features etc.*

- Are new installations checked for legionella risk? To design out risk is the best possible solution.
- Are contractor repairs ensuring dead legs are properly removed and pipe runs are correctly installed?
- Is there a sampling programme to provide reassurance that controls are effective?
- Have adequate scopes of work been developed for each workstream?



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LEGIONELLA RISK ASSESSMENT

Legionella risk assessments are required to all properties to establish the risk from legionella and the controls required for effective management.

KEY CONSIDERATIONS

- Have you completed legionella risk assessments for all your buildings and structures containing water systems?
- Are you confident in the quality of the risk assessments completed? Are there known misses or caveats which make you uncomfortable? Have they expired?
- Do you use an independent LCA member consultancy, separate from the repairs contractor? If not how do you manage conflict of interest?
- Have you confirmed the competence of those delivering the work? How?



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LEGIONELLA MONITORING

Once an appropriate control programme has been designed by the risk assessor, monitoring becomes an essential part of your responsibility to control legionella.

KEY CONSIDERATIONS

- Has a monitoring programme been developed for all your buildings and structures containing water systems?
- Is the monitoring programme proportionate to the risk identified?
- Is the programme fully implemented, with documentary evidence of all tasks being completed?
- Are non-conformances resolved, with documentary evidence held in the logbook?
- Do you use an independent LCA member consultancy, separate from the repairs contractor? If not how do you manage conflict of interest?
- Have you confirmed the competence of those delivering the work? How?

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LEGIONELLA SAMPLING

Sampling water for legionella, TVC, Coliforms and E.Coli, is an optional industry best practice, providing reassurance and evidence that your control schemes are effective.

KEY CONSIDERATIONS

- Do you conduct any water sampling as part of your control scheme? Is this a risk-based programme designed in proportion to the risk identified?
- Are samples analysed in a UKAS accredited laboratory?
- Are non-compliant results actioned appropriately? Are these actions recorded?
- Do you use an independent LCA member consultancy, separate from the repairs contractor? If not how do you manage conflict of interest?
- Have you confirmed the competence of those delivering the work? How?



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LEGIONELLA REMEDIAL WORKS

It is crucial that issues highlighted during risk assessment or monitoring are resolved to control risk, this must be completed in a reasonable timescale.

KEY CONSIDERATIONS

- Do you employ a remedial works contractor able to resolve plumbing or disinfection issues?
- Do you vet and regularly review their documentation to ensure competence? Including method statements for each job instructed?
- Do you check their work to confirm it has been appropriately completed, removing the risk identified?
- Do you resample after remedial works are complete (when appropriate)?
- Do you update the logbook following remedial works?



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LEGIONELLA TRAINING

Competence is crucial for stakeholders in legionella control at all levels.
Training must be regular and appropriate to the individuals role and your property stock.

KEY CONSIDERATIONS

- Have all roles listed within the legionella management team received appropriate training?
- Have all other managers, contractors and personnel involved in legionella control received training?
- Has practical training been provided for those completing monitoring tasks in-house?
i.e. weekly flushing of low use outlets or descaling showers
- Have refresher courses been arranged at regular intervals?



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WE HOPE THAT YOU HAVE FOUND THIS GUIDE HELPFUL



Riverside is one of the UKs leading independent test and inspection consultancies, employing 95 staff from our locations in the Southeast and Midlands.

We have extensive experience across sectors, serving some of the UKs largest and most prestigious property stocks.

We are LCA members and believe strongly in our values of independent expertise, protecting people and providing an honest and responsive service.

If you need help with legionella compliance, get in touch and we can guide you through the process.

Jonathan & Chris
Owners of Riverside Environmental Services Ltd



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