



**St Mary's
University
Twickenham
London**

Policy and Procedures for the Control of Legionella Bacteria in Water Systems

**HSPG 28
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1: Statement of Intent and Commitment

It is the intent of the University to control the risk of Legionella Bacteria being produced in water systems within the University in a manner that reduces the risk of University staff, students, contractors and visitors contracting Legionnaires disease.

The University is committed to achieving this intent by the most reasonably practicable means possible, and in a way that ensures a co-ordinated approach between all services and facilities within the University

The University will ensure compliance is achieved with the requirements of all relevant legislation and codes of practice.

The relevant legislation & codes of practice are listed in Appendix 1.

The University will ensure that all parties involved in achieving this intent are given all necessary information, instruction, training and facilities to allow the intent to be realised safely and with the informed consent and co-operation of all parties involved.

2: Duties and Responsibilities

The duties are to:

- Locate and assess the condition of water systems within the University to create and maintain records of the location and condition of water systems within the University
- Assess the condition and risk of Legionella Bacteria being produced by water systems within the University, produce and execute a detailed plan for the management of water systems within the University
- Review and monitor the plan for the management of water systems within University
- Provide information, instruction and training to all individuals who may come into contact with water systems within the University
- Control access to the water systems within the University
- Control the methods of work used on the water systems within the University
- Provide adequate financial and other resources to allow the safe management of water systems within the University
- To notify the Local Authority of the existence, installation or removal of cooling towers or evaporative condensers
- To routinely monitor the water systems to determine bacteria levels

RESPONSIBILITIES

2.1 THE VICE PRINCIPLE AND THE BOARD OF GOVERNORS MUST:

Ensure that the St Mary's University's policy for the Control of Legionella Bacteria in Water Systems is implemented.

Monitor the implementation of the policy to ensure that working arrangements and the provision of financial, technical and human resources are consistent with meeting the requirements of this policy.

Instigate arrangements to ensure that University employees have the necessary facilities, training and allied competencies to discharge the duties assigned to them under this policy.

Ensure that any breaches of compliance with this policy are fully investigated and, where appropriate, further action to be taken.

Annually review the performance of the University in relation to compliance with the requirements of this policy.

2.2 THE DIRECTORS OF ESTATES/FACILITIES MUST:

Ensure that arrangements are documented and implemented which assign specific and appropriate Legionella control duties to named managers, supervisors and employees within Estates/Facilities.

Implement arrangements to ensure that all works carried out by, or for, Estates/Facilities involving water systems, comply with this policy.

Ensure that the necessary requirements for the safe management of water systems are fully identified and incorporated into any design or specification made by, or for, Estates/Facilities.

Ensure that the personnel of Estates/Facilities are provided with suitable and sufficient financial, technical and other resources to enable them to safely carry out the Legionella control duties that are assigned to them.

Instigate arrangements to ensure that Estates/Facilities managers, supervisors and employees have the necessary equipment, training and allied competencies to discharge the duties assigned to them under this policy.

Ensure that any breaches of compliance with this policy by Estates/Facilities personnel are fully investigated and where appropriate further action taken.

2.3 THE LEGIONELLA CONTROL MANAGER (MAINTENANCE MANAGER) MUST:

Ensure that adequate competent advice and assistance with regard to the control of Legionella Bacteria in water systems is available to meet the University's needs.

Make available to University personnel, students, contractors, agents and visitors any relevant instruction or information on the control of Legionella Bacteria that is necessary to ensure their health and safety when on the University premises or sites.

Ensure that any reports of major damage to water systems are reported to the Health & Safety Officer and are actioned in accordance with this policy.

Ensure that procedure 3.1: Identification and Categorisation of Water Systems is carried out.

Maintain the University's Register of Water Systems in accordance with the current Property Portfolio.

Ensure that any breaches of compliance with this policy are fully investigated and where appropriate that further action is taken.

Notify the Local Authority of the existence, installation or removal of cooling towers or evaporative condensers.

Ensure the testing of water systems for bacteria levels is suitable and sufficient.

Investigate any reported suspected contamination by Legionella Bacteria.

2.4 MAINTENANCE MANAGER / PLUMBERS MUST:

Implement local arrangements to ensure that the works they carry out or manage, which involve water systems comply with the requirements of this policy.

Ensure that the necessary requirements for the safe management of water systems are fully identified and incorporated into any design or specification, which they have responsibility for.

Ensure that they and all employees under their control are provided with adequate equipment, information, training and instruction to enable them to work on water systems within the University without risk to their own, or others, health and safety.

Ensure that a Risk Assessment is carried out to determine the requirements for controlling water systems under their control. Method Statements and procedures to be prepared for any procedures to be prepared for any processes that could impact on water systems.

To provide details of any work that they arrange to be carried out on water systems within the University are incorporated into the University's Register of Water Systems.

Ensure that all relevant personnel know the details and location of the University's Register of Water Systems.

Report any damage to water systems that they observe to their line manager, the Legionella Control Officer and to co-operate with any investigations carried out.

Ensure that contractors for which they have responsibility implement arrangements to manage Legionella Bacteria that are satisfactory and in accordance with this policy.

Ensure that all work involving water systems in student accommodation is directed to and managed by Estates/Facilities.

Ensure that contractors working on student accommodation implement arrangements to manage Legionella Bacteria that are satisfactory and in accordance with this policy.

Ensure that all relevant personnel know the details and location of the University's Register of Water Systems.

Ensure that staff or contractors report any damage to student accommodation water systems to them and the Legionella Control Manager.

2.5 CONTRACTORS MUST:

Liaise with the Maintenance Manager at St Marys to ensure that the necessary requirements for the safe management of water systems are fully identified and incorporated into any specification, design or works carried out for the University.

Liaise with the Maintenance Manager to provide details of any work, and the Risk Assessments and Method Statements associated with that work, that they carry out on water systems within the University for incorporation into the University's Register of Water Systems.

Ensure that all employees under their control are provided with adequate equipment, information, training and instruction to enable them to work on water systems within the University without risk to health and safety.

Ensure that all employees under their control working on water systems within the University comply with instructions and procedures issued for safe working.

Ensure that water systems are tested for Legionella Bacteria on completion of work.

2.6 THE HEALTH AND SAFETY OFFICER MUST:

Ensure that adequate and competent health and safety assistance is available to meet the University needs.

Investigate any reported damage to water systems and file a written report of findings created by the Maintenance Manager.

Co-operate with investigations into any breaches of compliance with this policy.

Monitor compliance with this policy.

3: Arrangements and Procedures

3.1: IDENTIFICATION AND CATEGORISATION OF WATER SYSTEMS

The aim of this procedure is to identify and record the location, and type, of water systems within the University, and to categorise those systems.

Responsibility for managing this procedure lies with the Maintenance Manager

Procedure

3.1.1 A suitable and competent contractor must be selected to carry out a survey of buildings and facilities to locate, type and categorise and record water systems

The contractor selected must provide evidence of accreditation for Legionella control surveys from UKAS or a similar organisation

3.1.2 The selected contractor must be given all appropriate information on the University's buildings and facilities, such as:

- Descriptions, plans and drawings of the buildings and facilities
- Known Hazard and Risk information
- Site rules and Safety requirements
- Existing surveys
- Health and Safety Files (CDM)
- Details of previous works carried out

3.1.3 The selected contractor must be instructed to identify and survey:

- The location of the water system and the description of that system
- The category of the water system as detailed by the Water Supply (Water Fittings) Regulations
- The use of the system
- The condition of the water system (including sampling results)
- The risk rating for the water system

The risk rating categories will be:

High: The condition of the water system is such that immediate control action must be taken.

Medium: The condition of the water system is such that whilst immediate control action may not be necessary, such action should be carried out at the earliest opportunity. The water system should also be examined regularly and a plan for its management drawn up and acted upon.

Low: The condition of the water system is such that no immediate control action is considered necessary. The water system should also be examined regularly and plans for its management drawn up and acted upon.

3.1.4 The Maintenance Manager must enter the results of the survey into the University's Register of Water Systems and make the details and location of the register known to all relevant personnel.

3.1.5 The Maintenance Manager must maintain The University's Register of Water Systems by amending the register as appropriate and making the details of amendments known to all relevant personnel.

3.1.6 The Maintenance Manager must review and amend as appropriate the University's Register of Water Systems:

- Annually, and
- Whenever damage to a water systems is reported, or
- Whenever a report of work carried out on water systems is received, or
- Whenever a report on the condition of water systems containing material is received.
- Whenever property acquisitions and disposals are notified by Estates/Facilities
- Whenever changes of tenure are notified by Estates/Facilities

Forms (see Appendix 1)

LC 1. The University's Register of Water Systems

LC 2. Report of damage to Water Systems

LC 3. Report of work carried out on Water Systems

3.2: MONITORING AND MAINTENANCE OF WATER SYSTEMS

The aim of this procedure is to monitor and maintain water systems within the University.

The responsibility for managing this procedure lies with the Maintenance Manager.

Procedure

3.2.1 A competent Contractor must be selected to monitor and maintain the water systems contained within the University.

The contractor selected must provide evidence of competence and relevant experience for the monitoring and maintenance of Legionella Bacteria within water systems

3.2.2 The selected contractor must be given all appropriate information on the University's buildings and facilities, such as:

- Descriptions, plans and drawings of the buildings and facilities
- Known Hazard and Risk information
- Site rules and Safety requirements
- Existing surveys
- Health and Safety Files (CDM)
- Details of previous works carried out
- The University's Register of Water Systems
- A copy of the University's Strategy and Policy for the Control of Legionella Bacteria in Water Systems

3.2.3 The selected contractor must be instructed to:

- Determine the works required to restore and maintain the water systems to a safe condition

- Develop and execute a suitable monitoring and sampling programme to meet the requirements of the Code of Practice – L8 - Legionnaires' Disease – the control of Legionella in Water Systems
- HSG 274 - Legionella Technical Guidance
- Send a copy of the monitoring and sampling programme to the Maintenance Manager
- Complete, as required forms
 - LC 2 Report of damage to water systems
 - LC 3 Report of work carried out on water systems and the monitoring and sampling programs

3.2.4 The Maintenance Manager must ensure that the results of the monitoring and maintenance are entered into the University's Register of Water Systems and make the details of amendments known to all relevant personnel.

Forms

LC 1 The University's Register of Water Systems
 LC 2 Report of damage to Water Systems
 LC 3 Report of work carried out on Water Systems

3.3: MAINTENANCE PROCEDURES FOR WORK ON WATER SYSTEMS CARRIED OUT BY THE UNIVERSITY'S DIRECTLY EMPLOYED MAINTENANCE PERSONNEL

The aim of this procedure is to ensure that maintenance procedures for work on water systems carried out by the University's directly employed maintenance personnel are safe and meet the requirements of current legislation and best practice.

The responsibility for managing this procedure lies with the officer managing the maintenance operation

Procedure

- 3.3.1** A suitable and competent maintenance operative, trained in accordance with the requirements of procedure 3.6 must be selected and authorised to carry out the tasks.
- 3.3.2** The selected maintenance operative must be given all appropriate information on the University's buildings and facilities, such as:
- Descriptions, plans and drawings of the buildings and facilities
 - Known Hazard and Risk information
 - Site rules and Safety requirements
 - Existing surveys
 - Health and Safety Files (CDM)
 - Details of previous works carried out
 - Access to the University's Register of Water Systems
- 3.3.3** The selected maintenance operative must be given a detailed description of the tasks involving water systems and instructed to:

- Carry out the works in accordance with the procedures detailed in this policy
- Get written acceptance from the task managing officer for the arrangements planned for
 - The protection of University personnel and Members of the Public from the work activities.
 - The alternative arrangements to control any disruption to fire or other emergency procedures
- Provide a certificate of acceptable cleanliness on completion.
- Report any damage to water systems to The Legionella Control Manager on form LC 2. Report of damage to water systems

3.3.4 The officer managing the maintenance operation must:

- Notify the Maintenance Manager of:
 - The scope and duration of the works
 - The area to be handed over to the contractor for the duration of the work
 - The alternative arrangements to control any disruption to fire or other emergency procedures
- Complete form LC 3. Report of work carried out on water systems and forward, with a copy of the certificate of acceptable cleanliness to the Maintenance Manager on completion of the works.

Forms (see Appendix 2)

- LC 2. Report of damage to water systems
 LC 3. Report of work carried out on water systems

3.4: MAINTENANCE PROCEDURES FOR WORK ON WATER SYSTEMS CARRIED OUT BY CONTRACTORS

The aim of this procedure is to ensure those maintenance procedures for work on water systems carried out by Contractors are safe and meet the requirements of current legislation and best practice.

The responsibility for managing this procedure lies with the officer managing the maintenance operation

Procedure

- 3.4.1** A competent Contractor must be selected to carry out maintenance tasks on water systems contained within the University.

The Contractor selected must provide evidence of competence and relevant experience for carrying out maintenance tasks on Legionella Bacteria within water systems.

- 3.4.2** The selected Contractor must be given all appropriate information on the University's buildings and facilities, such as:

- Descriptions, plans and drawings of the buildings and facilities
- Known Hazard and Risk information
- Site rules and Safety requirements
- Existing surveys, sampling and monitoring results
- Health and Safety Files (CDM)
- Details of previous works carried out
- A copy of the University's Register of Water Systems

3.4.3 The selected Contractor must be given a detailed description of the tasks involving water systems and instructed to:

- Carry out the works in accordance with the procedures detailed in this policy
- Produce and get written acceptance from the officer managing the maintenance operation for the Risk Assessments, Method Statements and arrangements planned for:
 - The protection of University personnel and Members of the Public from the work activities.
 - The alternative arrangements to control any disruption to fire or other emergency procedures.
- Provide a certificate of acceptable cleanliness on completion.
- Report any damage to water systems to The Legionella Control Manager on form LC 2. Report of damage to water systems.

3.4.4 The officer managing the maintenance operation must:

- Notify the Maintenance Manager of:
 - The scope and duration of the works
 - The area to be handed over to the contractor for the duration of the work
 - The alternative arrangements to control any disruption to fire or other emergency procedures
- Provide suitable Risk Assessment & Method Statements for the effect of the proposed work on existing activities and emergency arrangements to the personnel responsible for managing activities in the area affected by the proposed Contractor's works.
- Complete form LC 3. Report of work carried out on water systems and forward, with a copy of the certificate of acceptable cleanliness to the Legionella Control Manager on completion of the works.

Forms (see Appendix 2)

- LC 2. Report of damage to water systems
 LC 3. Report of work carried out on water systems

3.5: CONTRACT CONTROL PROCEDURES FOR WORKS ON WATER SYSTEMS

The aim of this procedure is to ensure that works carried out on water systems are executed in a safe manner and meet the requirements of current legislation and best practice.

The responsibility for managing this procedure lies with the Project Officer managing the contract

Procedure

3.5.1 The Project Officer must provide all information relevant to the contract relating to water systems to the Planning Supervisor for inclusion in the Pre-Tender Health and Safety Plan, including copies of the University's Register of Water Systems and the University's Control of Legionella Bacteria in Water Systems Policy.

3.5.2 The Project Officer must assess the contract to determine if the works require any Water Systems in the proposed works to be removed or modified, before or during the contract works and to make appropriate arrangements to satisfy the requirements of the assessment.

3.5.3 The Project Officer must select a suitable contractor to carry out any identified work on Water Systems in accordance with:

- The University's Contractor Selection Procedure
- The University's Policy for the Control of Legionella Bacteria in Water Systems
- Procedure 3.4 Maintenance Procedures for Work on Water Systems carried out by Contractors.

3.5.4 The Project Officer must obtain risk assessments and systems of work from the selected Contractor, which include suitable management procedures to prevent risk of exposure to Legionella Bacteria during the works to any University staff, students, visitors or members of the public.

3.5.5 The Project Officer and The Contractor must complete form LC 4. Project Officer and Contractors agreement of the condition of water systems Pre and Post contract works, before the contract works start and at project completion.

3.5.6 The Project Officer must issue and control Permits to Work to the Contractor for any works on Water Systems.

3.5.7 The Project Officer must monitor the Contractors' activities during the contract works to ensure that the management procedures to prevent risk of exposure to Water Systems during the works to any University staff, students, visitors or members of the public are correctly implemented.

3.5.8 The Project Officer must provide all relevant information relating to work carried out on Water Systems to the Planning Supervisor for inclusion in the Health and Safety File and complete form LC 3. Report of work carried out on Water Systems.

Forms (see Appendix 2)

- LC 1. The University's Register of Water Systems
- LC 2. Report of damage to Water Systems
- LC 3. Report of work carried out on Water Systems
- LC 4. Project Officer and Contractors agreement of the condition of Water Systems Pre and Post contract works.

3.6: INFORMATION, INSTRUCTION & TRAINING.

The aim of this procedure is to ensure that personnel receive appropriate information, instruction and training to enable them to safely carry out their duties regarding water systems within the University.

The responsibility for managing this procedure lies with all Managers and Supervisors having control of personnel.

Procedure

3.6.1 All Managers and Supervisors must identify the levels of responsibility and involvement with water systems that personnel within their management control require to carry out their assigned tasks within the University.

Managers and Supervisors must liaise with the Health & Safety Officer to determine and arrange appropriate information, instruction and training for the identified personnel.

3.6.2 Mandatory levels of information, instruction and training.

Legionella Awareness Briefing

A briefing to explain the:

- Hazards of Legionella Bacteria
- University's Strategy, Policy and Procedures for the Control of Legionella Bacteria in Water Systems
- Do's and Don'ts.

This briefing must be given to all University personnel involved with the University water systems including the Housekeeping staff.

Key Post Holder Instruction and Training.

The Department Manager must arrange for suitable instruction and training on how to carry out the Duties and Responsibilities detailed in the University's Policy and Procedures for the Control of Legionella Bacteria in Water Systems to be given to each nominated Post Holder.

Maintenance Personnel Instruction, Training and Authorisation.

Managers responsible for Maintenance Personnel must arrange for suitable instruction and training to be given for those personnel who are to be authorised to carry out the tasks detailed in procedure 3.3: Maintenance Procedures For Work On Water Systems Carried Out By The University's Directly Employed Maintenance Personnel.

This training must include a suitable trade test and written authorisation to carry out the tasks detailed in procedure 3.3 for those personnel who pass the trade test.

3.6.3 Refresher Training

Refresher training must be carried out at whichever is soonest:

- A maximum frequency of three years, or
- After a significant change to the University's Strategy or Policy relating to Control of Legionella Bacteria in Water Systems
- After a significant change in legislation relating to Control of Legionella in Water Systems, or
- After a significant change in best work practice relating to Tasks involving Water Systems.

3.6.4 Records of Training

Copies of all water system related briefings and training must be sent to the Health & Safety Officer and uploaded to SMILE Elearning platform by the department manager.

These must include but not be limited to:

- Training attendance registers
- Written Authorisations for the work tasks detailed in procedure 3.3

3.7: EMERGENCY PROCEDURE FOR SUSPECTED CONTAMINATION BY LEGIONELLA BACTERIA

The aim of this procedure is to ensure that the risk to health posed by possible exposure to Legionella Bacteria is minimized and controlled.

The responsibility for managing this procedure lies with Estates/Facilities

The University's Register of Water Systems indicates where, within the University premises water systems are present. Implementation of the policy for the control of water systems ensures that Legionella Bacteria is managed in a manner that will prevent the risk of harm to health.

However, from time to time, accidental damage to water systems may result in a risk of Legionella Bacteria.

Procedure

3.7.1 The person discovering the suspected contamination

In normal working hours (0830 – 1700)	Telephone the Estates/Facilities Help Desk on 020 8240 4036
Outside of normal working hours (1700 – 0830)	Telephone the Emergency Line in the Security Control Room on 020 8240 4060

You will be instructed of the action to take.

3.7.2 The duty Estates/Facilities Help Desk Operator

Must:

Record the details of:

- Location of the suspected contamination
- The circumstances of the suspected contamination
- The person reporting the suspected contamination and their contact number
- The date and time of the suspected contamination
- The date and time of the report of the suspected contamination

Instruct the person reporting the suspected contamination to:

- Evacuate the area and inform the evacuees that Water Systems have been damaged in the local vicinity and that the area is being evacuated as a precaution.
- Complete a register of all persons who have been evacuated from the area.
- Take appropriate action to secure the area and wait in a safe place adjacent to the area until the duty Estates/Facilities Maintenance Officer arrives.
- Hand a copy of the Attendance Register to the duty Estates/Facilities Maintenance Officer.
- Notify the duty Estates/Facilities Maintenance Officer of the details of the suspected contamination.
- Notify the Maintenance Manager and the Health & Safety Officer.

3.7.3 The Duty Estates/Facilities Maintenance officer

Must:

- Attend the site of the contamination and assume control of the area from the person who reported the contamination
- Make the area safe
- Report the damage of the water systems to the Maintenance on form LC 2 Report of damage to water systems.

3.7.4 The Maintenance Manager

Must:

Investigate any reported damage to water systems and file a written report of findings with the Health & Safety Officer.

Forms (see Appendix 2)

LC 2. Report of damage to water systems.

APPENDIX 1: References

1. The Health and Safety at Work etc Act 1974
2. The Management of Health and Safety at Work Regulations
3. The Control of Substances Hazardous to Health Regulations 2002 (as amended 2013)
4. The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (as amended 2013)
5. The Notification of Cooling Towers and Evaporative Condensers Regulations 1992
6. Management of the risks from Legionella in Colling Towers & Evaporative Condensers
7. Minimizing the Risk of Legionnaires' Disease – CIBSE – TM13: 2000
8. Cold Water Storage Tanks by S. Loyd – Technical Note TN 13/98
9. Legionnaires' Disease – The Control of Legionella Bacteria in Water Systems – Approved Code of Practice + Guidance L8, HSE
10. Water Regulations Guide
11. Essential Information for Providers of Residential Accommodation – Legionnaires' Disease. HSE Free Leaflet
12. Legionnaires' Disease – A Guide for Employers. HSE Free Leaflet
13. HSG 274 - Legionella Technical Guidance

APPENDIX 2: Forms

- | | |
|-------------|--|
| LC 1 | The University's Register of Water Systems |
| LC 2 | Report of Damage to Water Systems |
| LC 3 | Report of Work Carried out on Water Systems |
| LC 4 | Project Officer and Contractors Agreement of the Condition of Water Systems Pre and Post Contract Work |

Form LC 1. The St Mary’s University Register of Water Systems *

Location of Water Systems	Description and Use of the System	The Classification of Water System	Set Up of System	Result of Testing for Bacteria / Legionella	Risk rating	Monitoring/ Inspection due	Monitoring/ Inspection Report reference	Planned Maintenance/ Testing Date/ Reference

- *Also refer to the University’s Schedule of Legionella Logbooks*

Form LC 2. Report of Damage to Water Systems

From:	
Position	
Contact number	
e-mail address	
To: Maintenance Manager Mr Graeme Woolger – Tel No: 020 8240 4329 or Estates/Facilities Help Desk Tel No: 020 8240 4036	
Location of Damaged Water System	
Description of damage	
Action taken (if any)	
Date of report	
Signature	

Form LC 3. Report of work carried out on Water Systems

From:	
Position	
Contact number	
e-mail address	
To: The Maintenance Manager Mr Graeme Woolger – Tel No: 020 8240 4329 or Estates/Facilities Help Desk Tel No: 020 8240 4036	
Location of work carried out on Water Systems	
Description of work carried out	
Further action required (if any)	
Date of report	
Signature	

Form LC 4. Project Officer and Contractors agreement of the condition of Water Systems Pre and Post contract works.

Project Officer		
Contact number		
e-mail address		
Contractor		
Contact number		
Address		
Description and location of work to be carried out.		
Description and location of any Water Systems in the works area.		
Condition of any Water Systems in the works area pre-contract works. (Photographs of the Water Systems should be included whenever practicable)		
Condition of any Water Systems in the works area post-contract works. (Photographs of the Water Systems should be included whenever practicable)		
Further action required (if any)		
Date of report	Pre-contract works	Post contract works
Signature of Project Officer		
Signature of Contractor		

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