

Committee: **Executive Committee**

Date of meeting: **14<sup>th</sup> October 2020**

Report Subject: **Review into Water Supply Quality in Schools**

Portfolio Holder: **Executive Member for Environment and Regeneration  
and Executive Member for Education**

Report Submitted by: **Corporate Director of Regeneration and Community  
Services and Interim Corporate Director of Education**

Reporting Pathway								
Directorate Management Team	Corporate Leadership Team	Portfolio Holder / Chair	Audit Committee	Democratic Services Committee	Scrutiny Committee	Executive Committee	Council	Other (please state)
	22/9/2020				13/10/20	14/10/20		

## 1. Purpose of the Report

- 1.1 The purpose of the report is to update Members on the outcome of the review undertaken by Integrated Water Services (IWS) resulting from the water quality issues experienced in our schools during the period of Covid19 shutdown.

## 2. Scope and Background

### 2.1 Background

- 2.1.1 The Council has taken a pro-active and comprehensive approach to managing the reopening of schools from a Health and Safety perspective, including water testing in accordance with the Approved Code of Practice (ACOP) L8 and Health & Safety Executive (HSE) specific advice. Importantly, the safety of our children and staff is the priority and is of paramount importance in dealing with the school water supply issues across the school estate.

- 2.1.2 In accordance with national guidance in respect of Covid19 schools were closed from Monday 23<sup>rd</sup> March to 29<sup>th</sup> June 2020. Normally schools are only closed for a period of five to six weeks through the summer holiday period and the closure period was unprecedented.

- 2.1.3 In order to learn from the reopening process implemented by the Council, and to place the Council in a more robust position should a further extended period of school closure be experienced an Independent review has been undertaken.

### 2.2 Procurement

- 2.2.1 Quotations for undertaking the review were obtained from the following three firms, obtained from the NPS Legionella framework.

1. Healthy Building International
2. Integrated Water Services
3. Second Element

2.2.2 Integrated Water Services (IWS) was the firm selected to undertake the review, based on cost and their compliance with the tender brief.

### 2.3 Scope and Findings of the Review

2.3.1 It was proposed by IWS that the scope of the review would include selecting twelve school sites from the total of twenty-nine school sites.

2.3.2 The following schools were selected by IWS to be included within the review.

1. Blaen-y-Cwm Primary School
2. Bryn Bach Primary School
3. Brynmawr Foundation School
4. Canolfan yr Afon (Riverside) School
5. Coed-y-Garn Primary School
6. Ebbw Fawr Primary / Pen-y-Cwm Special School
7. Ebbw Fawr Secondary School
8. St Mary's Church in Wales Primary School
9. Sofrydd Primary School
10. Tredegar Comprehensive School
11. Willowtown Primary School
12. Ystruth Primary School

2.3.3 The summary details of the IWS review are included in Appendices 1 and 2. The key recommendations identified from the IWS report are detailed below:

- (i) Investigate a suitable on-line monitoring Legionella program. To allow data information to be stored accessed and audited more efficiently.
- (ii) Undertake more intensive training of staff involved in the Legionella monitoring testing program, particularly in the area of water system flushing.
- (iii) Review our Legionella risk assessments to ensure that they are sufficiently up to date to comply with the legislation.
- (iv) Analyse the IWS information, and implement areas of good practice.
- (v) Reconsider suitability of "normal" Legionella Risk Management Policy in the light of the on-going Covid19 situation, particularly in the area of system flushing.

2.3.4 An action plan to take forward the recommendations is shown in Appendix 3

2.3.5 The summary details of the IWS review are included in Appendices 1 and 2, Appendix 1 is the Legionella Management Review, which specifically refers to the findings from the analysis of the twelve schools selected in the IWS review. Appendix 2 is the Water Supply Quality Review based on the water management procedures implemented during the period of the shutdown to allow our schools to reopen.

- 2.3.6 The IWS review suggests schools should not be closed due to high TVC results. The Council's view at that time however, is that high TVC sample results could indicate Legionella contamination, and disinfection and resampling was carried out until the Legionella test results were obtained. TVC samples on hot water systems are carried out for e-coli and other dangerous bacteria that can be harmful from handwashing and ingestion.
- 2.3.7 It needs to be recognised that the Legionella Control legislation is not necessarily prescriptive and as such its implementation by different organisations may vary, albeit still comply with the legislation. The common view of Technical, H&S and Environmental Health officers, in consultation with Education colleagues, was that the approach to reopening schools was managed in an effective and safe manner. It is also acknowledged however, that there are lessons to be learned from the COVID situation, which will strengthen our practices and procedures moving forward. These learning points feature in the action plan included in Appendix 3.

### **3. Options for Recommendation**

#### **3.1 Options for Approval**

The report was considered by the Community Services Scrutiny Committee, opened up to the Education and Learning Committee, on 13<sup>th</sup> October 2020. A verbal update on the discussion from this Committee, including the chosen option for recommendation, will be provided to the Executive Meeting.

- 3.1.1 The options for approval are:
- 3.1.2 Option 1 – Accept the current Legionella monitoring process that is in place, in compliance with the ACOP L8 regulations.
- 3.1.3 Option 2 – Implement appropriate review changes, particularly in light that Covid19 which is still prevalent within the country, and localised lockdowns may result in school full or partial closures, which could result in further water quality issues.
- 3.1.4 Option 2 is the preferred option.
- 3.1.5 Appendix 3 identifies an action plan for implementation of the above recommendations. It is also proposed that progress made against the action plan will be monitored by a six monthly update report to CLT.

### **4. Evidence of how does this topic supports the achievement of the Corporate Plan / Statutory Responsibilities / Blaenau Gwent Well-being Plan**

#### **4.1 Evidence**

- 4.1.1 The actions to keep maintain our water quality systems supports the Corporate Plan to maintain education objectives, and meet the authority's statutory responsibilities and wellbeing goals.

## 5. **Implications**

### 5.1 Impact on Budget (short and long term impact)

5.1.1 The impact on the budget of implementing Option 2 could be that specialist Legionella software will need to be procured and also staff resources may need to be increased to undertake the higher level of monitoring and training required.

The staff resource requirements will be reviewed once the revised system is in place.

### 5.1.2

The additional revenue costs will be identified as a cost pressure within the Corporate Landlord budget, pending consideration of additional revenue funding being allocated in the 2021/2020 budget review process.

## 6.0

### **Risk including Mitigating Actions**

### 6.1 Water Quality Risks Causing Elevated Bacteria Contamination Levels

6.1.1 The risks of individuals being affected by legionella and other water bacteria in our schools is low, if the ACOPS L8 regulations and the Health and Safety processes are in compliance with the regulations. The Council took a risk based management to the reopening of schools. There were a number of risk mitigation factors utilised that enabled the safe reopening of schools e.g. portable handwashing units were deployed in those affected schools. It is important to recognise that no cases of sickness were reported throughout the period of school reopening.

6.1.2 The risks in schools are considered to be very low and therefore increasing the amount of monitoring and testing needs to be reviewed in that context, including cost of both financial and staff resources required. Legionella health and safety risk management is one of a large number of statutory risks that we have to manage e.g. electrical, fire alarms, emergency lighting, lifts inspections, and asbestos, which all have a cost to the authority in both financial and staff time.

6.1.3 It also needs to be recognised that throughout the Covid19 shutdown daily discussions were taking place between Technical, Health and Safety and Environmental Health officers to review and manage the potential health risks from water contamination, in order to ensure that the risks to children and staff were mitigated within health and safety requirements.

### 6.2 Legal

6.2.1 The testing and mitigation measures that are in place are in compliance with the Health and Safety Executive Approved Code of Practice (L8) and HSE Guide 274.

### 6.3 Human Resources

- 6.3.1 The Council's corporate response team have worked extensively to deliver a positive outcome in challenging circumstances, and in the light of the emergency response to the COVID 19 pandemic.

### 7.0 **Supporting Evidence**

#### 7.1 Review Documents

- 7.1.1 The review undertaken by IWS is included in the two supporting documents Appendices 1 and 2.

#### 7.2 Preventative focus

- 7.2.1 The important fact is that no known cases or water related sickness has been reported. Although some schools have been used for the period of shutdown as childcare hubs, this provides a strong indication that the Council's proactive management of the situation has worked effectively.

#### 7.3 Integration (across service areas)

- 7.3.1 The team involved with the management of this water contamination situation includes officers from Education, Property Services, Health and Safety and Environmental Health Departments in the Council.

#### 7.4 Monitoring Arrangements

- 7.4.1 Statutory procedures are already in place to monitor and control the quality of our water systems, however, they will be reviewed on the basis of risk and the effects that long periods of shutdown of buildings can have on the quality of the water. However, it does need to be recognised that the normal longest period of our schools is for five/six weeks in the summer, and no issues of contamination have been experienced that schools are closed during the traditional summer holiday period.

### **Background Documents**

Appendix 1 – IWS Letter - Legionella Management Review Blaenau Gwent  
Appendix 2 – IWS Letter – Water Supply Quality Review Blaenau Gwent  
Appendix 3 – Action Plan