

01 September 2020

Re: Legionella management Review Blaenau Gwent

Following on from the recent log book audit reviews of twelve schools for Blaenau Gwent, we have completed an audit form for each school. We have observed significant gaps in your Legionella management plans across all schools. In its current form, Blaenau Gwent would not be deemed compliant with current Guidance based on the information provided from this Audit.

The Group Legionella Policy has not been provided, no clear lines of communication have been provided for the group or any schools, training records for staff involved have been provided however in many cases this requires updating. These documents are required to be compliant with HSG 274 as a matter of urgency.

Legionella Risk Assessments are out dated and were not provided in each case and the reviews provided are insufficient to provide clear details of the water systems specific information and the requirements needed under the HSG 274 Part 2. A new Legionella Risk Assessment would be recommended for each site. Schematic drawings should be renewed and assist with providing drinking water

There is a Hydrotherapy Pool present on EBBW FAR Primary School and no Risk Assessment or records have been provided for this and it is unclear if the pool is operating within current guidance, it was stated in the LRA review that quarterly bacterial analysis is being taken however records for this have not been presented.

EBBW Far primary has a water softener and no records for looking after this equipment have been provided.

There is a contractor carrying out monthly tasks across the sites and records are available in paper form for monthly and 3 monthly tasks however when there has been a non-conformance it is unclear if / or follow up actions have been taken to resolve the issues and some non-conformances have been repeated month after month suggesting that compliance with HSG 274 is not happening. To assist with compliance we would recommend on line log books to assist, currently there are 29 schools in the scheme and obtaining information in paper form from each school is difficult. An on line log book would gather all information in one place and provide a list of defects each month that can be actioned and signed off when completed. When discussing works with members involved in the L8 programme there is definitely confidence that works have been carried out however providing paper work has been a challenge and therefore would be deemed non compliant.

It has not been specified on the paperwork or in the LRA Reviews which outlets are sentinel points in the water systems, this is a requirement under HSG 274. Schematic diagrams of the water system would assist with this task.

Little used outlet flushing documents have not been provided in some cases and when they have been provided there is insufficient evidence in the reports to specifically state which taps have been flushed, outlet flushing records should state which little used outlets have been flushed & for how long and not a generic statement with a single tick and in some cases on unbranded A4 paper.

Calorifiers do not appear to be internally inspected as part of the regime despite this being an annual task under the HSG 274 part 2, inspection paperwork from the contractor state visual inspection only, suggesting no internal inspections are carried out.

Disinfection Certificates / paperwork provided by the contractor does not state which disinfectant has been used or what PPM level is achieved during disinfection, PH was not noted either, this should be visible for auditing.

TMV servicing records are present however they do not appear to be in line with annual frequencies required and it is also not clear from the paperwork if these are failsave checks only or full service and calibrations / Strainer cleans as guidance advises.

Temperature monitoring records provided are incomplete for the year July 2019- July 2020

Shower descaling records are inconsistent and some hard to reach areas are not recorded as being flushed / descaled, see reports for specific sites.

Following the schools shutdown and subsequent reopening in June 2019 legionella samples were taken from each school and results reported and disinfections carried out where elevated results had been found. TVCC samples were also taken from both hot and cold systems and elevated results actioned. The benefit of TVCC samples from hot systems is unclear.

Kind regards,

Darren Edwards WM Soc | Business Development Manager
IWS Water Hygiene

Fernleigh House, Almondsbury Business Centre, Woodlands,
Bradley Stoke, Bristol, BS32 4QH

Tel: 03452 668 924

Mob: 07741 737577

E-mail: Darrenedwards@integrated-water.co.uk

Web: www.integrated-water.co.uk