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LCA (Code of Conduct Water Treatment Management) – Client Obligations Advice Notice

Doc Ref	OCO-LCA-1.2
Issue Date	28/10/2024
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Revision No	17

Clients Obligations under L8

‘OCO Ltd’ is a member of the Legionella Control Association (formerly the UK’s Code of Conduct Association) - The code requires as part of a service provider’s commitments that OCO Ltd, explain in detail the clients obligations under the current legionellosis legislation, this includes:

- Health and Safety at Work etc Act 1974,
- Control of Substances Hazardous to Health Regulations (2002),
- Management of Health & Safety at Work Regulations.

For further details on your obligations under the above law, see www.legionellacontrol.org.uk

Under the ‘Approved Code of Practice and Guidance’ entitled “Legionnaires Disease: The control of Legionella Bacteria in water systems” L8 owners and operators of water systems are required to:

- Appoint a responsible person – who is responsible for ensuring the implementation of the control scheme and ensuring a suitable and complete record system is in operation.
- Record the name and position of each individual responsible for carrying out tasks and an indication of the lines of communication.
- Have plans or schematic drawings of the water systems.
- A written scheme should be prepared for controlling any risks identified. The scheme should specify measures to be taken to ensure that the risk is minimised and actions to be taken in the event of poor results or evidence that the scheme is not remaining effective.
- Maintain a record of Results and certificates of testing, monitoring, inspection and cleaning activities.
- A corrective action register of remedial works required and completed.
- Conduct reviews of the effective delivery of the control scheme.
- Issue and implement “Escalation Process” in the event of poor results.

Responsible Person

A Manager, Director or other nominated person who have similar status and have sufficient authority, competence and knowledge of the installation to ensure that all operational procedures are carried out in a timely and effective manner.

It is the duty of the responsible person to make reasonable enquiries to ensure that organisations such as water treatment companies, consultants and suppliers as well as personnel from their organisation, are competent and suitably trained and have the necessary equipment to carry out their duties.

Others may be appointed to carry out the various control measures, all people who have responsibilities with respect to minimization of the risk both on site or suppliers should be identified in writing. The overall responsibility for the record system being suitable and sufficient remains with the responsible person.

Service providers

Whoever designs, manufactures, imports or supplies water systems that may create a risk of exposure to legionella bacteria should, so far as is reasonably practicable:

(a) Ensure that the water system is so designed and constructed that it will be safe and without risks to health when used at work;

and

(b) Provide adequate information for the user about the risk and measures necessary to ensure that the water systems will be safe and without risks to health when used at work. This should be updated in the light of any new information about significant risks to health and safety that becomes available.

Suppliers of products and services:

(a) ensure that measures intended to control the risk of exposure to legionella bacteria are so designed and implemented that they will be effective, safe and without risks to health when used at work;

(b) Provide adequate information on the correct and safe use of products, taking into account the circumstances and conditions of their use;

(c) ensure that any limitations on their expertise or on the products or services they offer are clearly defined and made known to the person upon whom the statutory duty falls or the person(s) appointed to take managerial responsibility

(d) ensure that any deficiencies or limitations which they identify in the occupier's systems or written scheme to control the risk of exposure to legionella bacteria are made known to the person upon whom the statutory duty falls or the person(s) appointed to take managerial responsibility;

And

(e) Ensure that their staff have the necessary ability, experience, instruction, information, training and resources to carry out their tasks competently and safely.

Specific allocation of responsibilities and arrangements for the control of Legionellosis

	TASK	Assigned To
1	Identification of the statutory 'Duty Holder'	Client
2	The appointment of a responsible person	Client
3	The appointment of a deputy	Client
4	Conducting of a Legionellosis risk assessment	*
5	Provision of system schematics	*
6	Remedial or corrective actions required with priority / degree of risk	*
7	Programme for corrective action to be undertaken	Client
8	Review of Legionellosis risk assessment	Client
9	Production of the written scheme for prevention or control	Client
10	Precautions to be taken	Client
11	Method Statements for works carried out	OCO LTD
12	COSHH & Risk assessments	OCO LTD
13	Provision of safety data sheets	OCO LTD
14	Programme of works	Client
15	Provision of control parameters, measurement methods, sample locations & frequencies as advised in any tender return documents	OCO LTD
16	Auditing control procedures	Client
17	Provision of operating manuals	Client
18	Emergency start-up and shut-down procedures	Client
19	Description of normal and safe operation	Client
20	Actions in the event of positive legionella results / outbreak	Client
21	Identifying training needs	OCO LTD
22	Identifying client competence	Client
23	Provision of a suitable record system**	Client
24	Maintaining the record system**	Client
25	Notification to the local authority of Escalation Process	OCO LTD
26	Remedial or corrective actions required following implementation of Escalation Process	Client

* Subject to additional instruction by the client

** OCO limited is responsible for the records of the tasks they undertake; we maintain these records for 5 years. These are available to yourselves for that period upon request. The Client is responsible for the records of the tasks they undertake. These should be maintained for 5 years ideally in a central location, e.g. logbook.

Checklist for hot and cold water systems

Service	Action to Take	Frequency	Assigned To
Calorifiers	Inspect calorifier internally by removing the inspection hatch or using a borescope and clean by draining the vessel. The frequency of inspection and cleaning should be subject t the findings and increased or decreased based on conditions recorded	Annually, or as indicated by the rate of fouling	OCO Ltd
	Where there is no inspection hatch, purge any debris in the base of the calorifier to a suitable drain. Collect the initial flush from the base of hot water heaters to inspect clarity, quantity of debris, and temperature.	Annually, but may be increased as indicated by the risk assessment or result of inspection findings	OCO Ltd
	Check calorifier flow temperatures (thermostat settings should modulate as close to 60 °C as practicable without going below 60°C) Check calorifiewr return Temperaturs (not below 50deg C)	Monthly	OCO Ltd
Hot Water Services	For non-circulating systems: take temperatures at sentinel points (nearest outlet, furthest outlet and long branches to outlet) to confirm they are at a minimum of 50°C within one minute (55 °C in healthcare premises)	Monthly	OCO Ltd / Contract Administrator
	For circulating systems: take temperatures at return legs of principal loops (sentinel points) to confirm they are at a minimum of 50deg C (55deg C in healthcare premises). Temperature measurements may be taken on the surface of metallic paperwork.	Monthly	OCO Ltd / Contract Administrator

	For circulating systems: take temperatures at return legs of subordinate loops, temperature measurements can be taken on the surface of pipes, but where this is not practicable, the temperature of water from the last outlet on each loop may be measured and this should be greater than 50°C within one minute of running (55°C in healthcare premises). If the temperature rise is slow, it should be confirmed that the outlet is on a long leg and not that the flow and return has failed in that local area.	Quarterly (ideally on a rolling monthly rota)	OCO Ltd / Contract Administrator
	All HWS systems: take temperatures at a representative selection of other points (intermediate outlets of single pipe systems and tertiary loops in circulating systems) to confirm they are at a minimum of 50°C (55°C in healthcare premises) to create a temperature profile of the whole system, over a defined time period.	Representative selection of other sentinel outlets considered on a rotational basis to ensure the whole system is reaching satisfactory temperatures for legionella control.	OCO Ltd / Contract Administrator
POU Water Heaters (no greater than 15 litres)	Check water temperatures to confirm the water operates at 50-60°C (55°C in healthcare premises) or check the installation has a high turnover.	Monthly – six monthly , or as indicated by risk assessment	N/A
Combination water heaters	Inspect the integral cold water header tanks as part of the cold- water storage tank inspection regime, clean and disinfect as necessary. If evidence shows that the unit regularly overflows hot water into the integral cold water header tank, instigate a temperature monitoring regime to determine the frequency and take precautionary measures as determined by the findings of this monitoring regime.	Annually	N/A
	Check water temperatures at an outlet to confirm the heater operates at 50-60°C	Monthly	N/A

Cold Water Tanks	Inspect cold water storage tanks and carry out remedial work where necessary	Annually	OCO Ltd
	Check the tank water temperature remote from the ball valve and the incoming mains temperature. Record the maximum temperatures of the stored and supply water recorded by fixed maximum /minimum thermometers where fitted	Annually (summer) or as indicated by the temperature profiling	OCO Ltd
Cold water services	Check temperatures at sentinel taps (typically those nearest to and furthest from the cold tank, but may also include other key locations on long branches to zones or floor levels). These outlets should be below 20°C within two minutes of running the cold tap. To identify any local heat gain , which might not be apparent after one minute, observe the thermometer reading during flushing.	Monthly	OCO Ltd
	Take temperatures at a representative selection of other points to confirm they are below 20°C to create a temperature profile of the whole system over a defined time period. Peak temperatures or any temperatures that are slow to fall should be an indicator of a localised problem	Representative selection of other sentinel outlets considered on a rotational basis to ensure the whole system is reaching satisfactory temperatures for legionella control.	OCO Ltd
	Check thermal insulation to ensure it is intact and consider weatherproofing where components are exposed to the outdoor environment	Annually	OCO Ltd
Showers and spray taps	Dismantle, clean and descale removable parts, heads , inserts ad hoses where fitted	Quarterly or as indicated by the rate of fouling or other risk factors, eg areas with high risk patients	OCO Ltd / Contract Administrator

POU filters	Record the service start date and lifespan or end date and replace filters as recommended by the manufacturer (0.2 um membrane POU filters should be used primarily as a temporary control measure while a permanent safe engineering solution is developed although long- term use of filters may be needed in some healthcare situations)	According to manufacturers guidelines	N/A
Base exchange softeners	Visually check the salt levels and top up salt, if required. Undertake a hardness check to confirm operation of the softener.	Weekly , but depends on the size of the vessel and the rate of salt consumption	N/A
	Service and disinfect	Annually, or according to manufacturers guidelines	N/A
Multiple use filters	Backwash and regenerate as specified by the manufacturer	According to manufacturer guidelines	N/A
Infrequently used outlets	Consideration should be given to removing infrequently used showers, taps and any associated equipment that uses water. If removed any redundant supply pipework should be cut back as far as possible to a common supply (e.g. to the recirculating pipework or the pipework supplying a more frequently used upstream fitting) but preferably by removing the feeding “T”.	Weekly , or as indicated by the risk assessment	OCO Ltd / Contract Administrator
	Infrequently used equipment within a water system (ie not used for a period equal to or greater than seven days) should be included on the flushing regime. Flush the outlets until the temperature at the outlet stabilises and is comparable to supply water and purge to drain.	Weekly , or as indicated by the risk assessment	OCO Ltd / Contract Administrator
	Regularly use the outlets to minimise the risk from microbial growth in the peripheral parts of the water system, sustain and log this procedure once started.	Weekly , or as indicated by the risk assessment	OCO Ltd / Contract Administrator

	For high risk populations, eg healthcare and care homes, more frequent flushing may be required as indicated by the risk assessment.	Weekly , or as indicated by the risk assessment	OCO Ltd / Contract Administrator
TMV's	Risk assess whether the TMV fitting is required, and if not, remove where needed inspect, clean, descale and disinfect any strainers or filters associated with TMV'S. To maintain protection against scald risk, TMV's require regular routine maintenance carried out by competent persons in accordance with the manufacturers instructions. There is further information in paragraphs 2.152- 2.168 of HSG 274 part 2.	Annually or on a frequency define by the risk assessment, taking account of any manufacturer's recommendations.	OCO Ltd / Contract Administrator
Expansion Vessels	Where practicable , flush through and purge to drain. Bladders should be changed according to the manufacturers guidelines or as indicated by the risk assessment	Monthly-six monthly as indicated by the risk assessment	OCO Ltd / Contract Administrator

Frequency		Domestic Hot and Cold Water Systems	Assigned To
1	Weekly	Flushing of little used outlets	Client
2	Weekly	Standby plant switching	Client
3	Weekly	Flushing of deadlegs	Client
4	Monthly	Temperature monitoring *	* OCO Ltd
5	Quarterly	Shower head cleaning and disinfection	Client
6	Quarterly	Bacterial sampling *	* OCO Ltd
7	Quarterly	Mechanical routines PPM	Client
8	Annual	Calorifier inspection, clean and disinfection.	OCO Ltd

***Subject to additional instruction by the client**

We confirm we have LCA membership for the service categories provided.