

Loss prevention standards

# Legionella Controls During COVID-19

Understanding the importance of maintaining water systems during the COVID-19 pandemic **is key to managing the risks of Legionnaires' disease.**



# Legionella Controls During COVID-19



## Introduction

Although there is an ever present need to protect people by identifying and controlling risks associated with legionella, this is particularly true when returning to premises after lockdown, especially following several dry, hot months.

If your building was closed or had reduced occupancy during the COVID-19 lockdown, stagnation could occur in water systems due to lack of use and this will increase the risks of Legionnaires' disease.



## Risk Assessment

Before reinstating water systems or restarting some 'at risk' air conditioning units (see below), you should review your risk assessment and think about how the legionella risks might have changed.

If the water system has remained in regular use throughout the lockdown, you should still review your risk assessment and continue to maintain your normal controls for the prevention of legionella growth.

You can find out what Legionnaires' disease is, where it comes from, how people get it and symptoms and treatment by reading the guidance produced by the [Health and Safety Executive \(HSE\)](#).

## Specific Controls to Consider During Lockdown and After

### Hot and cold water systems

Systems that were not used frequently during lockdown should have been flushed weekly to prevent water stagnation. If this was not done you will need to speak to your competent person/people to ensure systems are cleaned (if required) and disinfected before the building is occupied.

The following further guidance is available from the [HSE](#):

- Legionnaires' disease. The control of legionella bacteria in water systems - Approved Code of Practice and guidance on regulations L8
- Legionnaires' disease - Technical guidance HSG274 Part 2

### Cooling towers and evaporative condensers

You should have reviewed operations in advance of lockdown and made sure that safe systems of work continued to be maintained. This should have included ensuring that:

- adequately trained personnel were available to carry out essential checks and monitoring
- chemical supplies were maintained and dosed appropriately

If you did not review your operations before lockdown and put in place controls to maintain your existing arrangements, then speak to your water treatment company for help.

## Air conditioning units

You will need to review your legionella risk assessment for air conditioning units before restarting them if the site has been closed for any significant time during lockdown, and they have a source of water that can generate aerosol.

Small wall or ceiling-mounted units with closed cooling systems should not present a risk. Larger units may create a legionella risk if the condensate trays, or humidifier or evaporative cooling sections have not been properly drained and/or cleaned, allowing water to stagnate and become a reservoir for bacteria.

When reviewing your risk assessments, decide what the risks are for your units, if you need to clean them before they are turned on and if you will need assistance from a competent person to do this safely.

## Commercial spa pools and hot tubs

If commercial spa pools and hot tubs were:

- used during lockdown, you should have maintained the pre-lockdown control measures and should continue to do so
- not used for any significant time during lockdown, you should drain, clean and disinfect before reinstatement

## Reviewing control methods

If you changed or will be changing your control methods or strategy as a result of the review of your legionella assessment, you should not forget to also review your general Control of Substances Hazardous to Health (COSHH) assessments to ensure that operator safety as well as the legionella risk has been adequately considered. Operators may be exposed to additional or different risks.

You should also increase the level of monitoring during the commissioning of any new controls and ensure that the anticipated level of control is being reached/maintained.

## Personal protective equipment (PPE) requirements

There may be reduced or limited availability of PPE during and after lockdown. In planning for any reinstatement, you should also be aware that you may need to make PPE available and that reinstatement may not be able to proceed without it.

If you need to clean water systems, it's likely that respiratory protective equipment (RPE) will also be needed. RPE must:

- be adequate
- be suitable
- provide an assigned protection factor of at least 20

Disposable RPE, such as FFP3 respirators used by health and care workers, may be in short supply. If your usual types of RPE are unavailable, you can source alternatives as long as your risk assessment demonstrates they are suitable and adequate for workers and the task. An alternative could be:

- a reusable half-mask or full-face respirator fitted with a P3 filter
- a powered respirator and hood class TH2 or 3
- a powered respirator and close-fitting full-face mask class TM3
- an air-fed hood or full-face mask supplied with breathing quality air

You can find more information in [HSE guide to Respiratory protective equipment at work \(HSG53\)](#).

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## Checklist

A Legionella Controls Checklist is presented in Appendix 1 which can be tailored to your own organisation.

## Specialist Partner Solutions

You may need advice from a competent person and/or other specialist to help you identify and implement suitable controls for legionella.

It is possible that getting specialist help may be difficult during and immediately after the COVID-19 outbreak. If **you're unable to appoint someone with the appropriate authority and** competence to oversee the necessary controls and there is any doubt as to the on-going safety of the water system concerned, it must not be put back into operation.

As an Aviva policyholder, a selection of products and services are available to you, helping you to create and maintain an environment with reduced risk.

Our Specialist Partner, Bureau Veritas can help assist you in achieving compliance with the requirements for the control of legionella.

### Contact Details

E mail: [aviva.specialistinspections@uk.bureauveritas.com](mailto:aviva.specialistinspections@uk.bureauveritas.com)

Phone: 0345 600 1828

Website: <https://www.bureauveritas.co.uk/aviva-specialist-supplier>

## Additional Information

Relevant Loss Prevention Standards include:

- [Measures to Manage People and Operations Following Reinstatement after a Shutdown](#)
- [Risk Assessments During Rapid Change Events](#)
- [Measures to Reinststate Plant, Equipment and Processes](#)
- [Managing Change - Liability](#)

To find out more, please visit [Aviva Risk Management Solutions](#) or speak to one of our advisors.

Email us at [riskadvice@aviva.com](mailto:riskadvice@aviva.com) or call 0345 366 6666.\*

\*Calls may be recorded and/or monitored for our joint protection.

# Appendix 1 – Legionella Controls Checklist



Location	
Date	
Completed by (name and signature)	

	Legionella controls	Y/N	Comments
1.	We have reviewed our risk assessment and know what additional controls will be required before restarting/reinstating.		
2.	We have factored in time/resources for a visit by competent person/treatment company and any cleaning/disinfection that may be required.		
3.	Hot and cold water systems that were not used frequently during the lockdown were flushed weekly.		
4.	Where water systems were not flushed weekly, we have spoken to our competent person to discuss cleaning and disinfection.		
5.	We reviewed operation of cooling towers and evaporative condensers and maintained them throughout lockdown.		
6.	Where we did not use/maintain cooling towers and evaporative condensers throughout lockdown, we have spoken to the water treatment company for advice prior to reinstatement.		
7.	Risk assessments for any air conditioning units that have a source of water and were mothballed during lockdown have been reviewed.		
8.	Any larger air conditioning units that have condensate trays, or humidifier or evaporative cooling sections were drained and/or cleaned, have been reviewed by competent person/treatment company and had any cleaning/disinfection required.		

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	Legionella controls contd.	Y/N	Comments
9.	Any spa pools or hot tubs that were not in frequent use during lockdown have been drained, cleaned and disinfected before reinstatement.		
10.	General/COSHH assessment have been reviewed to ensure operator safety in the light of any changes to systems of control.		
11.	Any changes to systems of work and/or training brought about by changes in the controls used have been implemented.		
12.	Monitoring has been increased to ensure that any changes in the system of control are effective.		
13.	Adequate account has been taken of the availability/adequacy of appropriate PPE.		
14.	If requirements for operator safety or adequate legionella control have not been met, we acknowledge that we cannot reinstate the plant concerned.		
15.	Additional comments:		

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