



Defence
Infrastructure
Organisation

Safety Alert Part A, B & C

**Subject: Control of Legionella Bacterium
during COVID-19 lockdown**

Number SA 2020/54

DIO Sponsor: Richard Lowey, Head of Technical Services

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This Safety Alert is to be read by the following so appropriate action can be taken:

- 1. DIO Service Manager (or equivalent for non-NGEC contracts)**
- 2. DIO's Maintenance Management Organisations**
- 3. Others**

Others interested in the content of this Safety Alert might include:

Heads of Establishments, Prime Contractors, Private Finance Initiatives, Public-Private Partnership and other traditionally procured contracts, Infrastructure Managers and Property Managers with responsibility for MOD projects and Property Management Works Services (including the legacy work of EWCs/WSMs), Health & Safety Advisors.

When it takes effect: Immediately

When it is due to expire: When updated or rescinded.

Health and Safety

This Safety Alert does not necessarily cover all aspects of the subject matter and readers should make themselves aware of other potential issues. Readers should also not rely on DIO publications as their only means of becoming aware of safety, operational or technical issues, but they should consult widely across other media to maintain awareness.

Aim

1. To bring to the attention of appropriate persons the water hygiene risks in buildings and sites where reduced occupancy has significantly decreased water consumption due to COVID-19 government-imposed restrictions, and the risks associated with management of Legionella bacteria.
2. Additionally, to ensure that where issues are identified they are to be promptly reported to the appropriate persons, including Heads of Establishments (HoE).

Introduction

3. Compliance with the contents of this Alert will enable compliance with the Health & Safety at Work etc. Act 1974 and its subordinate Regulations.
4. The appropriate MOD officer shall arrange for the Maintenance Management Organisation (MMO) contractor to carry out all actions in accordance with this Safety Alert.
5. Any work required because of this Safety Alert must be carried out in accordance with JSP 375 Parts 1 & 2.
6. On MOD Establishments occupied by United States Visiting Forces (USVF) responsibility is jointly held by USVF and DIO(USF). At base level this jointly managed organisation is to take appropriate action to implement the contents of this Alert. Where this Alert contains procedures, which differ significantly from USVF practice a DIO (USF) code of practice will be issued.

Background

7. At a major base within UK high levels of legionella bacterium has been detected and as a result has not been eradicated by flushing or standard disinfection. In order to retain safety to staff on site a number of buildings have been closed pending a full investigation and remediation.
8. Government Imposed COVID-19 restrictions in 2020 have led to wholly, or partially, unoccupied facilities across the MOD estate. This has affected how the water systems within the facilities have been utilised, greatly reducing turnover of stored water. To mitigate against the adverse impact reduced water consumption, DIO Technical Bulletin 02/2020- Covid 19 Water Hygiene Issues 31 Mar 20 was published.
9. Robust Legionella Bacteria Management controls rely heavily on regular use of the water systems to control the proliferation of the bacteria. Additional essential requirements include implementing control schemes (e.g. Water temperature monitoring) and ensuring action items identified in Legionella Risk Assessments are funded and addressed.
10. Changes in water system use should activate a Legionella Risk Assessment review, as a minimum, in facilities where occupancy and therefore water usage has altered. The review could highlight the need for a sampling regime to be put in place or alternative further controls being implemented depending on the level of risk to occupants.
11. Legionella Sampling requirements are only implemented if the water system control schemes are brought into question and following advice from the Legionella Responsible Person and Water Hygiene Specialist appointed to manage Legionella on behalf of DIO on the MOD estate.
12. Legionella Management Processes were questioned recently at a MOD site leading to bacteria sampling regimes being implemented across multiple facilities at the site. This has resulted in high counts of Legionella Bacteria being identified within hot and cold-water systems, above the control action limits within Legionella Management Approved Codes of Practice and associated guidance. This MOD sites findings could potentially highlight similar issues across the entire estate.
13. These results highlight an unknown risk to occupants returning to workplaces following COVID-19 restrictions. Occupants who could potentially have underlying health conditions or have contracted

COVID-19 with affected immune systems. These susceptible individuals have a higher risk of contracting Legionellosis.

Requirements

14. The Legionella Responsible Person in conjunction with the Subject Matter Expert Water Hygiene Specialist are to provide DIO Duty Holders with assurance that the risk to occupants returning to work following COVID-19 restrictions is reduced to as low as is reasonably practicable.
15. This will include evidence that the changes to water system usage during the lockdown, alongside the occupant's susceptibility, have been risk assessed and any additional control measures have been implemented to mitigate any additional risks highlighted.
16. Risk items identified on the Legionella Risk Assessment action plans that remain unfunded and unaddressed are given priority for completion.

Part A

17. The DIO Service Manager (or equivalent), is advised to direct the Maintenance Management Organisation (MMO) to initiate the following tasks:
 - a. Confirm that the activities identified within TB 02/2020 have been completed throughout the period of reduced occupancy.
 - b. Review records of routine monitoring to identify anything that would indicate the system is operating outside normal parameters that would merit review of Legionella Risk Assessment.
 - c. Confirm that the Legionella Management Plan and Legionella Risk Assessment has been subject to review taking into account reduced occupancy and flushing or sterilisation programme iaw TB 02/2020 has been completed.
 - d. Review Legionella Action Plan to identify any remedials not completed or programmed, notifying DIO Service manager of all outstanding work, highlighting any which are unprogrammed or unfunded.
 - e. Provide assurance to the HoE/DIO Duty Holders that the facilities are safe for occupation at current and future levels advised by HoE or if not able to provide this assurance the confirmation that the HoE has been made aware of the Water Hygiene status, with any recommendations provided by the MMO's Water Hygiene specialist regarding occupation of all or part of the facility.
18. The MMO is to notify DIO Regional Delivery Safety Alerts Team (DIO-RDSafetyAlerts@mod.gov.uk), through their respective DIO Service Manager of the responses to and a list of the sites which have been reviewed in accordance with Para 17 by **cop 21 July 20**
19. Findings from **Part A** will dictate how **Part B** proceeds.

Part B

20. The DIO Service Manager (or equivalent), is advised to direct the Maintenance Management Organisation (MMO) to initiate the following tasks:
 - a. Review the findings of Para 17 and any mitigation proposed by the MMO's Water Hygiene specialist.
 - b. Agree with DIO HoE relative priorities for returning assets back to limited or full usage.
 - c. Agree with DIO Service Manager a prioritised programme of remedials, which may include testing and sterilisation, to enable the assurance at 17 e to be provided.
 - d. Review Legionella Risk Assessment and Management Plan to reflect revised status.

Part C

21. The MMO is to notify the DIO Service Delivery Safety Alert Team, (DIO-RDSafetyAlerts@mod.gov.uk), through their respective DIO Service Manager of the date actions detailed in **Part B**, was completed.

End