



Town Clerk: Caroline Leet

EDENBRIDGE
TOWN COUNCIL

Legionella

Written Scheme of Control

Adopted by full Council on 27 October 2025

Scheme of Control applicable to:

Council sites:

Doggetts Barn
Rickards Hall
The Depot
The Cemetery
Market Yard Public Toilets & Mess room
The Allotments (Swan Lane & Forge Croft (leased))

Leased sites:

Church House
The Pavilion

To be used with the Legionella Management Policy; and Legionella Risk Assessment.

1. Purpose

This Written Scheme of Control sets out the arrangements to prevent or control the risk of exposure to **Legionella bacteria** within all water systems under the management or responsibility of Edenbridge Town Council (ETC).

It is based on current risk assessments and will be reviewed every **two years**, or following any significant system change or incident.

2. Scope

This scheme applies to all council-owned, managed, or leased premises, including:

- Public toilets, depots, pavilions, halls, community buildings, and allotments.
- Associated hot and cold water systems, tanks, heaters, TMVs, and irrigation or shower systems.

For leased sites, responsibilities are shared as defined within lease or management agreements, but all **lease holders** remain responsible for compliance within their demised premises.

3. System Description

Each site has been assessed and documented in an external Legionella Risk Assessment (most recently completed March–May 2025).

Systems are generally **mains-fed**, with **point-of-use water heaters**, limited cold storage, and simple distribution networks.

Schematic diagrams are included within individual risk assessments.

4. Control Responsibilities

Role

Duty Holder (Edenbridge Town Council)

Nominated Person (Town Clerk)

Responsible Person

Deputy Responsible Person

Lease Holders (where applicable)

External Competent Contractor

Responsibility

The Town Council, as the corporate employer and owner of the premises, holds ultimate legal responsibility under the Health & Safety at Work etc. Act 1974 and COSHH.

Acts on behalf of the Council as the nominated individual for ensuring compliance and implementation of this scheme.

Manages and coordinates day-to-day control measures, record keeping, monitoring, and contractor liaison.

Provides cover in absence of the Responsible Person and assists in audits and reviews.

Where the lease specifies, carry out weekly flushing, temperature checks, visual inspections, and ensure defects are reported or rectified promptly. Maintain site-specific records and provide evidence of compliance to the Council as required.

Conducts risk assessments, sampling, disinfection, and technical advice or remedial work.

Role

All Staff & Volunteers

Responsibility

Follow instructions, report defects, and undertake any assigned monitoring or flushing activities.

5. Control Measures

5.1 Physical Control (Temperature Regime)

- **Cold water:** maintained **below 20°C** at outlets.
- **Hot water:** maintained **at or above 50°C** at outlets.
- **Point-of-use heaters:** set to **60°C** and flushed weekly if little used.
- **Showers and outlets not in regular use:** flushed **weekly for at least 2 minutes**.

5.2 System Cleaning and Maintenance

- **Taps, showers, and spray outlets:** cleaned and descaled **at least quarterly (minimum every 3 months)**.
- **Tanks and heaters:** inspected **annually**; cleaned/disinfected **as required** (e.g., visible debris or temperature failure).
- **TMVs:** checked and serviced **annually**.
- **Expansion vessels:** drained and flushed **annually** or fitted with flushing valves.
- **Dead legs:** removed where practical.

5.3 Record Keeping and Retention

- **Temperature monitoring and flushing records:** retained **throughout the period they are current and for at least two years afterwards**.
- **Records of any monitoring inspection, test, or check:** retained **for at least five years**, including:
 - Tank/heater inspection and cleaning records.
 - Contractor test reports and calibration checks.
 - Corrective and remedial action logs.

6. Verification and Checks

Check	Frequency	Responsible	Record
Temperature checks (hot & cold outlets)	Monthly	Staff/Responsible Person or Lease Holder	Temperature Log Sheet
Flushing of little-used outlets	Weekly	Caretaker/Staff or Lease Holder	Flushing Log
Visual inspection of tanks/heaters	6-monthly	Responsible Person	Inspection Log
TMV & vessel servicing	Annually	Contractor	Service Record
Review of all records	Quarterly	Responsible Person	File Audit Sheet
Risk assessment review	Every 2 years	External Contractor	Updated Assessment

7. System Effectiveness

The Responsible Person shall review all monitoring records quarterly to ensure that control measures remain effective.

If temperature readings or other parameters fall outside control limits, **remedial actions** must be initiated (see Section 8).

8. Remedial Action Procedures

If control parameters are not achieved:

1. **Re-test** and verify the reading or issue.
2. **Flush or disinfect** affected outlets/system.
3. **Investigate cause** (e.g., scale, insulation, low flow).
4. **Record findings and corrective actions.**
5. **Escalate** to external contractor if persistent.

If **Legionella bacteria are detected**, immediately:

- Isolate affected system or outlet.
- Notify the Town Clerk (Nominated Person) and Duty Holder.
- Engage external specialist for disinfection/testing.
- Notify Public Health Authority/HSE if required.
- Conduct incident review and update risk assessment.

9. Chemicals and Health & Safety

Temperature control is the **primary management method**.

If chemical disinfection is introduced:

- Only trained, competent contractors will handle dosing or biocides.
- COSHH assessments and manufacturer data sheets must be retained.
- Safe storage and disposal will be ensured in accordance with supplier guidance.

10. Records and Documentation

All Legionella management documentation will be held as follows:

- **Council-run sites:**
 - Master copies of all **risk assessments**, contractor reports, monitoring data, and policy documents will be retained at the **Town Council offices** (hard copy and electronic).
- **Leaseholder-managed sites:**
 - Weekly monitoring, temperature and flushing logs, and service/test records will be retained **on-site by the leaseholder**.
 - The Council will hold copies of the most recent **risk assessment** and may request monitoring records during audits or compliance reviews.

All records must be made available to enforcement authorities upon request.

11. Review and Audit

This Written Scheme will be:

- **Reviewed annually** by the Town Clerk (Nominated Person) and Responsible Person.
- **Revised** following any system modification, change in use, or incident.
- Supported by **professional Legionella risk assessments at least every two years**.