

# **HSE/ONR/LA**

## **Legionella Intervention Programme**

### **2013-2014**

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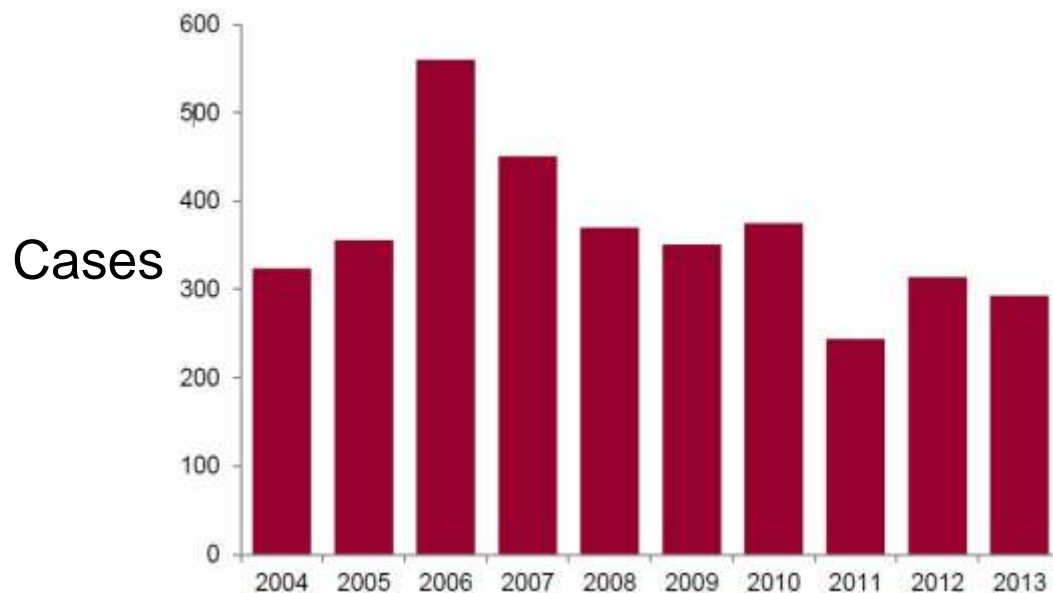
Field Operations Directorate

Occupational Hygiene Specialist Group



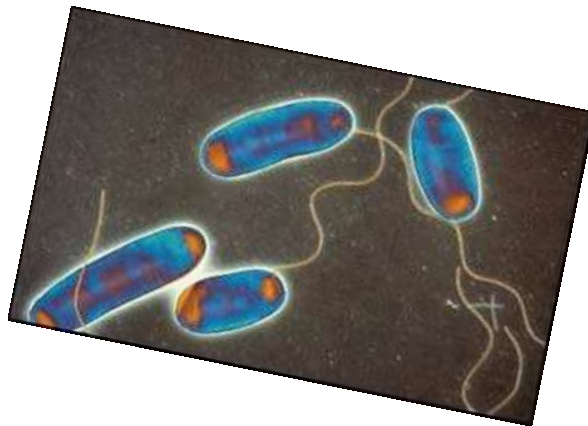
# Why the focus?

- Legionnaires' disease isn't going away
- HSE-commissioned enforcement and outbreak cause analysis
- Recent high profile outbreaks



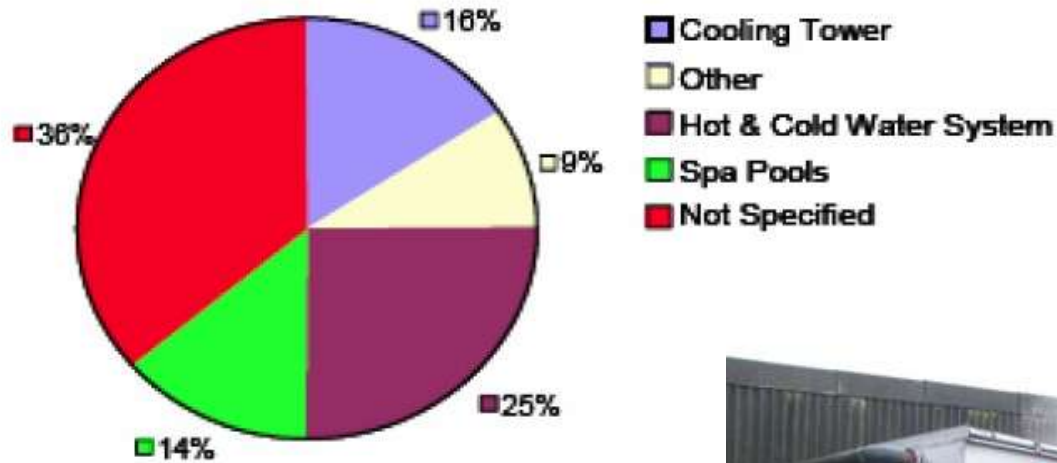
# Intervention aim

- Promote sustained compliance with relevant legislation by dutyholders
- Improve control of Legionella risks in highest risk systems



# Targeted to highest risks

Outbreaks by System Type (n = 44)



Wet evaporative cooling systems



# Multi-stranded intervention

- ‘Top down approach’
  - Revised ACoP and technical guidance
  - Work with key stakeholders
    - Service providers
    - Trade associations
    - Health and safety bodies
  - Dutyholder education events



# Compliance check visits

- Enforcing Authorities working together
- Local Authority registers of cooling towers and evaporative condensers
- Topic Inspection Pack on website
- Inspector training and briefings
- Site priority questionnaire
- Local intelligence



# Compliance check approach

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- Paperwork and physical inspection
- Dutyholders scored against 'Compliance Indicators' in 4 key topics
  - Risk Assessment
  - Written Scheme of Controls
  - Implementation of Written Control Scheme
  - Record keeping
- Competence integral to above



## Resource

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- 2482 sites involved in England, Scotland and Wales
- April 2013-August 2014 timescale
- Large proportion of HSE proactive inspections
- Technical support from HSE Occupational Hygienists



# Results 1

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- 1/3 of 1906 HSE-enforced sites breached health and safety law
- 400 Improvement Notices & 11 Prohibition Notices served on Legionella control or risk management
- Additional 100 INs & 8 PNs on work at height, control of contractors, etc



## Results 2

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- Improved rating scores over time due to engagement gearing effect
- Compliance worst on 'Implementation of Written Control Scheme'
- Proactive prosecutions where appropriate
- Enforcement also taken against service providers (outside of Intervention)

# Key findings

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- Combined intervention approach delivered significant benefits
- Comprehensive compliance picture for cooling towers and evaporative condensers
- Better than expected level of compliance
- Increased Inspector competence
- Productive relationships with key stakeholders
- Updated cooling tower site data

## Future work

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- Continuing key stakeholder work
- Consolidating changes to guidance
- Dealing with Legionella risks where they arise
- Using local intelligence to target poor Legionella management
- Assessing dry/wet cooling system risks
- Analysis for sector-specific trends

## Links and contact info

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- Intervention Topic Inspection Pack:  
[www.hse.gov.uk/legionnaires/assets/docs/cooling-tower-programme-inspection-pack.pdf](http://www.hse.gov.uk/legionnaires/assets/docs/cooling-tower-programme-inspection-pack.pdf)
- Intervention Board Paper:  
[www.hse.gov.uk/aboutus/meetings/hseboard/2015/250315/pmarb1527.pdf](http://www.hse.gov.uk/aboutus/meetings/hseboard/2015/250315/pmarb1527.pdf)

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10th IOHA International  
Scientific Conference

LONDON 2015



April 25th-30th 2015  
London Metropole Hotel

# Questions?

**BOHS**  
The Chartered Society for  
Worker Health Protection



IOHA & BOHS 2015  
London: Building on Occupational Hygiene Together

[www.iohalondon2015.org](http://www.iohalondon2015.org)