



STRAVICA

COMPANY POLICY | WATER HYGIENE & LEGIONELLA CONTROL

Health & Safety Policy

Safe Water. Safe People. Safe Systems Of Work.



Document Control

Item	Detail
Document Title	Health & Safety Policy - Water Hygiene & Legionella Control Services
Organisation	Stravica Ltd (Company No. 16756638)
Registered Address	20-22 Wenlock Road, London N1 7GU
Document Reference	STR-POL-HS-001
Version	1.0 (supersedes all previous Health & Safety Policy Statements)
Issue Date	24 October 2026
Next Scheduled Review	October 2027, or earlier following significant change, incident, enforcement action or change in legislation or guidance
Policy Owner	Adeola Olanrewaju, Director
Approved By	Adeola Olanrewaju, Director, on behalf of the Board of Stravica Ltd
Classification	Public - may be issued to clients, contracting authorities, auditors and enforcing authorities
Contact	info@stravica.uk www.stravica.uk

Revision History

Version	Date	Summary Of Change	Approved By
1.0	24 Oct 2026	Full rewrite to reflect Stravica Ltd's specialist focus on water hygiene and Legionella control. Adds water-specific legal framework, hazard controls, safe systems of work, sampling and result escalation, delivery partner standards, occupied-premises arrangements, KPIs and appendices.	A. Olanrewaju, Director

Related Stravica Policies

This policy should be read alongside the following Stravica Ltd policies, which together form the company's integrated management framework: Environmental Policy; Data Protection & GDPR Policy; Equality & Diversity Policy; Modern Slavery & Human Trafficking Policy; and Anti-Bribery & Corruption Policy.

Contents

1. Introduction And Purpose	4
2. Scope And Application	5
3. Legal And Regulatory Framework	6
4. Statement Of Intent	8
5. Organisation, Governance And Responsibilities	9
6. Health And Safety Management System	10
7. Risk Assessment And Control	11
8. Safe Systems Of Work For Water Hygiene Services	13
9. Permits To Work, Isolation And Confined Spaces	15
10. Hazardous Substances (COSHH)	15
11. Personal And Respiratory Protective Equipment	16
12. Emergency Preparedness And Response	17
13. Training, Competence And Awareness	18
14. Delivery Partner Selection And Management	19
15. Working In Occupied And Sensitive Premises	20
16. Health Surveillance And Wellbeing	21
17. Incident Reporting And Investigation	21
18. Records And Information Management	22
19. Performance Monitoring, Audit And KPIs	23
20. Communication, Consultation And Continuous Improvement	23
Appendix A - Accident Reporting And Investigation Procedure	25
Appendix B - COSHH Assessment Requirements	26
Appendix C - Monitoring And Sampling Result Escalation Matrix	27
Appendix D - Water Hygiene Control Reference	28
Appendix E - Delivery Partner Pre-Qualification Checklist	29
Appendix F - Glossary	30

1. Introduction And Purpose

1.1 About Stravica Ltd

Stravica Ltd is a UK prime contractor specialising in water hygiene and Legionella control for public and private sector estates. We deliver Legionella risk assessments, water hygiene monitoring, Legionella and water sampling, water tank cleaning and disinfection, water system remedial works and planned water hygiene maintenance. Our clients include housing providers, healthcare and care settings, education establishments, local authorities, transport operators and commercial estates.

Stravica operates as the accountable prime contractor on every contract. Operational delivery is carried out by carefully selected, vetted specialist water hygiene delivery partners working under Stravica's contract management, governance and assurance arrangements. Stravica retains full contractual responsibility to the client for the safety, quality and compliance of all work delivered under its contracts.

1.2 Purpose Of This Policy

This policy sets out how Stravica Ltd manages health, safety and welfare across all of its activities, with particular emphasis on the hazards that arise from water hygiene work. It translates legislation, Approved Codes of Practice and industry guidance into clear organisational duties, operational controls and behavioural expectations for everyone who works for, or on behalf of, Stravica.

Water hygiene work carries a dual safety responsibility. We must protect the people carrying out the work from hazards such as aerosols, chemicals, confined spaces, hot water and work at height. We must also protect the building occupants, residents, patients, pupils and members of the public who rely on the water systems we assess, monitor, sample, clean and repair. This policy addresses both.

1.3 Our Commitment

Stravica Ltd is committed to integrating health and safety into every business decision and every task. We believe that all injuries, cases of work-related ill health and water-borne infections arising from managed water systems are preventable. No contract, deadline or commercial consideration will take priority over the safety of people.

1.4 Objectives

- Prevent injury, ill health and property damage arising from Stravica's activities, with a target of zero RIDDOR-reportable incidents.
- Protect building users from Legionella, *Pseudomonas aeruginosa* and other water-borne hazards by delivering risk-based, evidence-led water hygiene services.
- Comply fully with UK health and safety legislation, ACoP L8, HSG274 and all applicable water hygiene standards and client requirements.
- Ensure that every person carrying out work on Stravica contracts is competent, trained, supervised and properly equipped.
- Select, manage and monitor delivery partners to a consistent, auditable standard.
- Provide clients with accurate, timely and verifiable records that support their own legal duties as Duty Holders.
- Promote continual improvement through measurement, audit, learning from incidents and management review.

Our Safety Principle

If a task cannot be carried out safely, it will not be carried out. Every person working on a Stravica contract has the authority and the obligation to stop work where they believe there is a risk to themselves or others, without fear of reprisal.

2. Scope And Application

2.1 Who This Policy Applies To

- Directors, employees, agency workers and any person engaged directly by Stravica Ltd.
- Delivery partners (subcontractors), their employees and any persons they engage on Stravica contracts.
- Visitors to Stravica premises and to sites where Stravica holds contractual responsibility.
- Client staff, residents, patients, pupils and members of the public who may be affected by Stravica's activities.

2.2 Services Covered

Service	Typical Activities	Principal Hazards
Legionella Risk Assessments	Site surveys of hot and cold water systems, asset registers, schematic drawings, temperature profiling, written scheme recommendations aligned to BS 8580-1	Access to plant rooms, roof spaces and risers; work at height; hot surfaces; asbestos; lone working
Water Hygiene Monitoring	Monthly sentinel outlet temperatures, calorifier checks, cold water storage tank temperatures, TMV checks, little-used outlet flushing records	Scalding; aerosol exposure; slips; manual handling; occupied premises
Legionella & Water Sampling	Pre- and post-flush sampling for Legionella, TVC, Pseudomonas aeruginosa, E. coli and coliforms in line with BS 7592; chain of custody to UKAS-accredited laboratories	Aerosol exposure; biological agents; transport of samples; scalding
Water Tank Cleaning & Disinfection	Draining, cleaning and chlorination of cold water storage tanks and calorifiers; system disinfection; dechlorination and controlled discharge	Confined spaces; hazardous chemicals; work at height; drowning; biological contamination; manual handling
Water System Remedial Works	Removal of dead legs, tank replacement and refurbishment, TMV servicing, insulation, pipework modification using WRAS-approved fittings	Hot works; electrical isolation; dust; asbestos; manual handling; interruption to supply
Planned Water Hygiene Maintenance	Scheduled PPM programmes including shower descaling and disinfection, flushing regimes, calorifier blowdowns and periodic inspections	Scalding; chemicals; repetitive tasks; aerosol exposure; occupied premises

2.3 Operating Environments

This policy applies to Stravica's office activities and to every client site where Stravica holds contractual responsibility. This includes social housing blocks and sheltered schemes, hospitals and community healthcare sites, care homes, schools, colleges and universities, local authority buildings, transport depots and rolling stock, leisure and commercial premises. Additional controls applicable to occupied and sensitive premises are set out in Section 15.

2.4 Geographical Application

Stravica Ltd operates across England, Scotland and Wales. Where devolved legislation, regulators or guidance apply, including Scottish Health Technical Memoranda in NHS Scotland premises, this policy is applied together with the relevant devolved requirements.

2.5 Contractual Status

This policy forms part of Stravica Ltd's quality assurance and compliance framework for public procurement. It is made available to clients, contracting authorities, auditors and enforcing authorities on request, and forms part of the contractual expectations placed on every delivery partner.

3. Legal And Regulatory Framework

3.1 Primary Health And Safety Legislation

- Health and Safety at Work etc. Act 1974.
- Management of Health and Safety at Work Regulations 1999.
- Control of Substances Hazardous to Health Regulations 2002 (as amended) (COSHH), which classify Legionella and other pathogenic micro-organisms as biological agents.
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).
- Confined Spaces Regulations 1997.
- Work at Height Regulations 2005.
- Workplace (Health, Safety and Welfare) Regulations 1992.
- Provision and Use of Work Equipment Regulations 1998 (PUWER).
- Manual Handling Operations Regulations 1992.
- Personal Protective Equipment at Work Regulations 1992 (as amended 2022).
- Electricity at Work Regulations 1989.
- Control of Asbestos Regulations 2012.
- Construction (Design and Management) Regulations 2015 (CDM), for remedial and installation works that constitute construction work.
- Regulatory Reform (Fire Safety) Order 2005.
- Health and Safety (First-Aid) Regulations 1981.
- Health and Safety (Display Screen Equipment) Regulations 1992.
- Control of Noise at Work Regulations 2005 and Control of Vibration at Work Regulations 2005.
- Health and Safety (Consultation with Employees) Regulations 1996 and Safety Representatives and Safety Committees Regulations 1977.
- Employers' Liability (Compulsory Insurance) Act 1969.

3.2 Water Hygiene Legislation, Codes And Guidance

Instrument	Relevance To Stravica Services
HSE ACoP L8 - Legionnaires' Disease: The Control of Legionella Bacteria in Water Systems (4th edition)	Sets the legal standard for identifying and assessing Legionella risk, preparing a written control scheme, implementing controls, keeping records and appointing a competent Responsible Person.
HSG274 Part 2 - The Control of Legionella Bacteria in Hot and Cold Water Systems	Technical basis for temperature control, monitoring frequencies, tank inspection, cleaning and disinfection, and sampling action levels.
HSG274 Part 3 - The Control of Legionella Bacteria in Other Risk Systems	Applies where sites include spa pools, humidifiers, vehicle wash systems, fountains and similar risk systems.
HSG282 - The Control of Legionella and Other Infectious Agents in Spa-Pool Systems	Applies to spa and hydrotherapy pools within assessed premises.
BS 8580-1:2019 - Water Quality. Risk Assessments for Legionella Control	Code of practice for the conduct, content and reporting of Legionella risk assessments.
BS 8580-2:2022 - Risk Assessments for Pseudomonas aeruginosa and Other Waterborne Pathogens	Applies to risk assessments in healthcare and other augmented care settings.
BS 7592:2022 - Sampling for Legionella Bacteria in Water Systems	Governs sample type, location, method, labelling, transport and chain of custody.
BS 8558:2015 and BS EN 806 (Parts 1-5)	Design, installation, testing, flushing, disinfection and maintenance of water services within buildings.
BS 8680:2020 - Water Safety Plans	Framework for water safety planning, particularly in healthcare and complex estates.
HTM 04-01 (Parts A, B and C) and SHTM 04-01	Safe water in healthcare premises in England and Wales, and NHS Scotland respectively, including Water Safety Group requirements.
Water Supply (Water Fittings) Regulations 1999 and Water Supply (Water Fittings) (Scotland) Byelaws 2014	Requirement to use compliant (WRAS-approved or equivalent) fittings and to prevent contamination, backflow and waste of water during remedial works.
Water Supply (Water Quality) Regulations 2016 (England), 2018 (Wales) and Public Water Supplies (Scotland) Regulations 2014	Wholesome water standards relevant to drinking water outlets and post-disinfection verification.
Notification of Cooling Towers and Evaporative Condensers Regulations 1992	Applies where assessed sites contain notifiable cooling systems.
Water Industry Act 1991 and Environmental Protection Act 1990	Control of discharge of chlorinated and dechlorinated water to sewer, and duty of care for waste.

3.3 Industry Codes

Stravica Ltd requires all water hygiene services on its contracts to be delivered in accordance with the Legionella Control Association (LCA) Service Provider Code of Conduct, and through delivery partners who are members of the LCA. This includes the LCA commitment that clients are made aware of their legal obligations, that services are delivered by trained and competent staff, and that clients are informed promptly of any significant risks identified.

3.4 Duty Holder And Responsible Person

Under ACoP L8, the employer or person in control of premises (the Duty Holder) retains legal responsibility for managing Legionella risk and appoints a Responsible Person to oversee day-to-day control. Stravica does not assume a client's statutory Duty Holder role unless this is expressly agreed in writing. Stravica will, however, actively support each client's Duty Holder and Responsible Person by providing competent services, clear explanations of legal obligations, accurate records, and prompt notification of any significant risk, adverse result or deviation from the written scheme.

3.5 Liability And Enforcement

Failure to comply with health and safety legislation may result in enforcement action, prosecution of the company and of individuals, and substantial fines under the Health and Safety Offences, Corporate Manslaughter and Corporate Homicide Definitive Guideline. Stravica will cooperate fully with the Health and Safety Executive, local authority Environmental Health Officers, the UK Health Security Agency, Public Health Scotland and any other regulator, and will maintain open and honest communication at all times.

4. Statement Of Intent

Stravica Ltd accepts its legal duty to ensure, so far as is reasonably practicable, the health, safety and welfare of all persons who work for or on behalf of the company, and of all others who may be affected by our activities. As a specialist in water hygiene and Legionella control, we recognise our particular responsibility for protecting building users from water-borne disease.

To meet this commitment, Stravica Ltd will:

- Treat health and safety as a core business value with equal standing to quality, financial and operational objectives.
- Identify hazards and assess risks for every activity and every site, and implement controls that follow the hierarchy of control.
- Deliver all water hygiene services in accordance with ACoP L8, HSG274, the relevant British Standards and the LCA Code of Conduct.
- Use only competent, vetted delivery partners who hold the accreditations, insurances and training required for the work.
- Ensure that no work starts on any site until a site-specific, unredacted Risk Assessment and Method Statement (RAMS) has been reviewed and accepted.
- Use UKAS-accredited (ISO/IEC 17025) laboratories for all microbiological analysis and maintain a full chain of custody for every sample.
- Notify clients promptly of any significant risk, adverse sampling result or deviation from the written scheme of control.
- Provide safe plant, equipment, chemicals and PPE, and maintain them in good condition.
- Provide adequate information, instruction, training and supervision.
- Consult with workers and delivery partners on matters that affect their health and safety.
- Report, investigate and learn from every accident, incident and near miss.
- Provide adequate resources to implement this policy, and review performance and this policy at least annually.

Policy Approval

- Signed on behalf of Stravica Ltd by Adeola Olanrewaju, Director.
- Date of approval: 24 October 2026.
- This statement is displayed at Stravica premises, issued to every delivery partner at mobilisation and published at www.stravica.uk.

5. Organisation, Governance And Responsibilities

5.1 Governance Model

Stravica Ltd operates a lean prime contractor governance model built on clear accountability. The Director holds ultimate responsibility for health and safety and is supported by contract management, compliance and procurement functions within Stravica, and by the competent persons, supervisors and operatives of each appointed delivery partner. Responsibilities are defined below and are recorded in each contract's mobilisation plan.

Role	Key Health And Safety Responsibilities
Director	Ultimate accountability for health and safety. Approves this policy and allocates resources. Leads management review. Acts as Contract Lead and Water Safety Lead on all contracts. Liaises with clients' Duty Holders and Responsible Persons, and with regulators. Approves delivery partner appointments and authorises suspension of unsafe work.
Water Safety Lead (held by the Director)	Ensures every contract has an agreed scope aligned to the client's written scheme. Verifies delivery partner competence. Reviews RAMS before work starts. Reviews monitoring and sampling data. Ensures adverse results are escalated within the timescales in Appendix C. Attends client Water Safety Group meetings where required.
Compliance & Procurement Administration	Maintains the approved delivery partner register, insurance, accreditation and training records. Tracks expiry dates. Maintains document control. Collates KPI data and incident records for management review.
Delivery Partner Contract Manager	Manages day-to-day delivery on Stravica contracts. Produces site-specific RAMS. Allocates competent operatives. Ensures equipment, chemicals and PPE are suitable. Reports incidents, adverse results and access failures to Stravica immediately.
Delivery Partner Competent Persons and Supervisors	Lead risk assessments and complex tasks. Supervise operatives. Conduct pre-start briefings and dynamic risk assessments. Issue and close permits to work. Stop unsafe work.
Water Hygiene Operatives and Risk Assessors	Follow RAMS and permits. Use PPE and RPE correctly. Record results accurately and honestly. Report hazards, defects, incidents and near misses. Exercise the right to stop work.
All Persons	Take reasonable care of themselves and others. Cooperate with Stravica. Do not interfere with anything provided for health and safety. Report concerns.

5.2 Prime Contractor Accountability

On every contract, Stravica Ltd is the prime contractor and the client's single point of accountability. Delegating operational delivery to a specialist partner does not transfer Stravica's contractual responsibility to the client. Stravica therefore retains direct oversight of delivery partner safety performance through RAMS approval, mobilisation checks, site audits, KPI reporting and contract review meetings, as set out in Section 14.

5.3 Competent Health And Safety Assistance

In accordance with Regulation 7 of the Management of Health and Safety at Work Regulations 1999, Stravica will secure competent health and safety assistance appropriate to the nature and scale of its activities. Where specialist expertise is required, for example in confined space rescue planning, asbestos management or healthcare water safety, Stravica will engage suitably qualified advisers. In healthcare premises this includes working with the client's appointed Authorising Engineer (Water).

5.4 Cooperation And Coordination

Where Stravica, its delivery partners, the client and other contractors share a workplace, Stravica will cooperate and coordinate safety arrangements in line with Regulation 11 of the Management Regulations. This includes exchanging risk information, agreeing permit and isolation procedures, and confirming emergency arrangements in writing before work starts.

6. Health And Safety Management System

6.1 Framework

Stravica Ltd operates a Health and Safety Management System aligned with the HSE's Plan, Do, Check, Act model (HSG65) and structured with reference to the principles of ISO 45001. The system is integrated with Stravica's contract management processes so that safety requirements are built into every stage of a contract, from tender through mobilisation, delivery, reporting and exit.

Stage	Health And Safety Activities
Plan	Review client written scheme, asset register and site information. Identify hazards and occupancy risks. Select a competent delivery partner. Agree scope, frequencies, access and permit arrangements. Set contract KPIs.
Do	Approve site-specific RAMS. Brief operatives. Issue permits. Deliver tasks in line with method statements. Record results digitally. Escalate adverse findings.
Check	Review completion and results data. Carry out site audits and observations. Monitor KPIs. Investigate incidents and near misses.
Act	Agree corrective actions. Update RAMS and procedures. Share lessons learned with delivery partners. Feed outputs into annual management review.

6.2 Documentation Hierarchy

1. Policies: strategic intent and commitments, including this policy.
2. Procedures: operational controls, including the procedures in the appendices to this policy.
3. Site-specific Risk Assessments and Method Statements (RAMS), COSHH assessments and permits to work.
4. Records: monitoring logbooks, sampling certificates, laboratory reports, training records, audits, inspections and incident reports.

6.3 Document Control

All controlled documents carry a reference, version number, issue date and review date. Superseded versions are withdrawn from use and archived. Printed copies are uncontrolled. Delivery partners must use the current versions of Stravica-approved forms and RAMS.

6.4 Digital Records And Data Integrity

Monitoring, sampling and inspection results are recorded at the point of work wherever possible, using time-stamped digital logbooks or job management systems. Results must reflect what was actually measured. Falsification, estimation or back-dating of records is treated as gross misconduct for Stravica personnel and as a material breach of contract for delivery partners. Records are handled in line with Stravica's Data Protection & GDPR Policy.

7. Risk Assessment And Control

7.1 Principles

Hazards will be eliminated or reduced so far as is reasonably practicable by applying the hierarchy of control: elimination, substitution, engineering controls, administrative controls and, as a last resort, personal protective equipment.

7.2 Risk Assessment Process

1. Identify hazards arising from the task, the water system, the chemicals used, the location and the building occupants.
2. Identify who might be harmed and how, with particular regard to vulnerable occupants, lone workers, young persons and new or expectant mothers.
3. Evaluate the risk and determine control measures following the hierarchy of control.
4. Record findings in a site-specific RAMS and communicate them to everyone carrying out the work.
5. Review the assessment annually, after any incident, or when the task, site, system or occupancy changes.

7.3 Water Hygiene Hazard Register

The following table summarises the principal hazards associated with Stravica's services and the minimum controls required on every contract. Site-specific RAMS must address each relevant hazard in more detail.

Hazard	Persons At Risk	Minimum Control Measures
Legionella and other water-borne pathogens (aerosol inhalation)	Operatives; building occupants	Minimise spray generation. Run outlets gently and direct flow to drain. Use shower hose bags or sock covers when flushing. Use FFP3 RPE where aerosol generation cannot be controlled, such as during tank cleaning, shower descaling and work on known positive systems. Exclude occupants from the work area.
Pseudomonas aeruginosa, E. coli and other biological agents	Operatives; vulnerable patients	Hand hygiene. Nitrile gloves. Cover cuts. Aseptic sampling technique. Augmented care protocols in healthcare settings.
Leptospirosis (Weil's disease) from rodent-contaminated water or tanks	Operatives	Inspect for vermin before entry. Wear waterproof gloves. Cover cuts. Hold a Leptospirosis awareness card. Report symptoms promptly.
Hazardous chemicals (sodium hypochlorite, chlorine dioxide, descalers, sodium thiosulphate)	Operatives; occupants	COSHH assessments. Never mix chemicals. Ensure ventilation. Use eye protection, gloves and RPE as specified. Provide spill kits and eyewash. Display warning signs. Isolate outlets during disinfection.

Hazard	Persons At Risk	Minimum Control Measures
Confined spaces (large water storage tanks, sumps, chambers)	Operatives	Avoid entry where possible. Where entry is unavoidable, follow the Confined Spaces Regulations with a permit to work, gas monitoring, forced ventilation, a trained top-person and an emergency rescue plan. Never work alone.
Work at height (loft tanks, roof plant, ladders)	Operatives; others below	Avoid where possible. Use suitable access equipment such as podium steps, towers and MEWPs. Ladders only for short-duration, low-risk work. Ensure safe loft boarding and edge protection.
Scalding and thermal injury (hot water at 60°C or above; thermal disinfection at 70°C or above)	Operatives; occupants	Take temperatures with calibrated probes rather than by hand. Wear heat-resistant gloves at calorifiers. Notify occupants. Post warning signage during thermal disinfection. Reinstate TMVs and check outlet temperatures before handover.
Drowning and slips in wet areas	Operatives	Drain tanks before entry. Ensure good housekeeping. Wear anti-slip footwear. Provide adequate lighting.
Electrical hazards (immersion heaters, pumps, UV units)	Operatives	Safe isolation and lock-off under the Electricity at Work Regulations. Use 110V or battery tools. Electrical works only by competent electricians.
Asbestos (lagging, tank lids, plant rooms)	Operatives; occupants	Review the asbestos register before work. Do not disturb suspect materials. Hold asbestos awareness training. Stop work and report if suspect material is found.
Manual handling (equipment, chemicals, tank lids, sample boxes)	Operatives	Task assessment. Mechanical aids. Team lifts. Decant chemicals into smaller containers where safe.
Lone working	Operatives	Lone working assessments. Check-in and check-out procedure. Lone worker devices where appropriate. No lone working in confined spaces or for high-risk tasks.
Interruption to water supply and contamination of supply	Occupants	Advance notice to residents and occupants. Temporary supplies for vulnerable occupants. Backflow prevention. Post-works flushing and sampling before reinstatement.
Violence and aggression in occupied premises	Operatives	Client information on known risks. Conflict awareness. Withdraw and report.

7.4 Specific Risk Assessments

Separate assessments are completed for confined spaces, work at height, lone working, manual handling, COSHH, young persons, new and expectant mothers, noise and vibration, display screen equipment, and occupational stress. New and expectant mothers must not undertake tasks involving exposure to chemical disinfectants or known contaminated systems without a specific assessment.

7.5 Dynamic Risk Assessment

Before starting any task, operatives must carry out a dynamic, point-of-work risk assessment to confirm that site conditions match the RAMS. Where conditions differ, for example unexpected occupancy, damaged access, suspected asbestos, contamination or unsafe plant, work must stop and the Delivery Partner Contract Manager and Stravica must be informed before work continues.

8. Safe Systems Of Work For Water Hygiene Services

This section sets the minimum standards that apply to each Stravica service. Detailed method statements are produced by the appointed delivery partner and approved by Stravica before work starts.

8.1 Legionella Risk Assessments

- Assessments are carried out by competent risk assessors in accordance with ACoP L8 and BS 8580-1, and BS 8580-2 where *Pseudomonas* risk applies.
- Each assessment includes a review of the existing written scheme and management arrangements, a full asset register, an up-to-date schematic diagram, temperature profiling of representative outlets and an assessment of vulnerable occupants.
- Findings are risk-rated and include clear, prioritised remedial recommendations and suggested reassessment intervals.
- Any significant risk identified on site, such as stored hot water below 60°C, contaminated tanks or unprotected dead legs serving vulnerable occupants, is reported to the client verbally on the day and in writing within 24 hours, without waiting for the final report.

8.2 Water Hygiene Monitoring

Check	Frequency (HSG274 Part 2)	Control Standard
Hot water sentinel outlets	Monthly	At least 50°C within one minute (55°C in healthcare premises)
Cold water sentinel outlets	Monthly	Below 20°C within two minutes
Calorifier flow and return	Monthly	Flow at least 60°C; return at least 50°C (55°C in healthcare)
Cold water storage tanks	Six-monthly temperature checks; annual inspection	Stored water below 20°C. Tank clean, covered, insulated and free of debris or vermin
Representative outlets on rotation	Annually	Hot and cold temperature standards as above
Little-used outlets	Weekly flushing	Flushed and recorded, or removed where not required
Thermostatic mixing valves	In line with risk assessment and manufacturer guidance	Fail-safe tested; strainers cleaned; outlet temperature verified
Showers and spray hoses	Quarterly descaling and disinfection, or as determined by risk	Visibly clean and free from scale

Where a reading falls outside the control standard, the operative must record the actual reading, re-test where appropriate and report the deviation through the escalation route in Appendix C. Readings are never adjusted or omitted.

8.3 Legionella And Water Sampling

- Sampling is carried out in accordance with BS 7592 by trained operatives using sterile containers with the correct neutralising agent.

- Pre-flush and post-flush samples are taken as specified, with sample point, time, temperature and outlet condition recorded.
- Samples are labelled, kept cool and dark, and delivered to a UKAS ISO/IEC 17025-accredited laboratory under a documented chain of custody, so that analysis begins within the timescales required by the method, normally within 24 hours of collection.
- Results are interpreted against HSG274 action levels (Appendix C). Any result requiring action is notified to the client within the timescales in Appendix C.
- Operatives minimise aerosol generation during sampling and wear appropriate PPE.

8.4 Water Tank Cleaning And Disinfection

- A permit to work is required. Confined space status is determined in advance, and where entry is unavoidable the arrangements in Section 9 apply.
- Occupants are notified in advance of any loss of supply. Alternative arrangements are made for vulnerable occupants and critical services.
- Tanks are drained, sediment is removed and contained, surfaces are cleaned and the tank is inspected for defects.
- Disinfection is carried out in accordance with HSG274 Part 2 and BS EN 806-4/BS 8558, typically using 50 mg/l free chlorine for a minimum of one hour, or as specified in the approved method statement. Chlorine levels are verified at the start and end of the contact period.
- Outlets are tagged "Do Not Use" during disinfection, with warning signs at affected areas.
- Water is dechlorinated, normally with sodium thiosulphate, before discharge to foul drainage with any required consent. Discharge to surface water drains is prohibited.
- Post-disinfection flushing is followed, where specified, by microbiological verification sampling before the system is returned to normal use.
- Before-and-after photographs and a completion certificate are provided to the client.

8.5 Water System Remedial Works

- All remedial works comply with the Water Supply (Water Fittings) Regulations 1999 (or the Scottish Byelaws) and use WRAS-approved or equivalent compliant materials.
- Works that constitute construction work are planned and managed under CDM 2015, including the appointment of duty holders and a construction phase plan where required.
- Isolations are controlled through permits and lock-off. Systems are flushed and, where new pipework is installed or a system is opened, disinfected before reinstatement.
- Hot works such as soldering and brazing require a hot works permit, fire extinguishers and a post-works fire watch.
- As-fitted information is provided so that the client's asset register, schematic and risk assessment can be updated.

8.6 Planned Water Hygiene Maintenance

- PPM schedules are agreed with the client and aligned to the written scheme and risk assessment.
- Each task is completed by competent operatives following task-specific method statements, and is recorded with date, time, operative and outcome.
- Missed visits caused by access failure are reported to the client within one working day and rescheduled, so that statutory monitoring intervals are not breached.

Positive Results And Outbreaks

Where Legionnaires' disease is suspected or confirmed in connection with a site, Stravica and its delivery partner will cooperate fully with the client, the local authority Environmental Health Officer, the HSE and the UK Health Security Agency or Public Health Scotland. Systems will not be disinfected or altered without the agreement of the investigating authority where this would destroy evidence needed for the investigation.

9. Permits To Work, Isolation And Confined Spaces

9.1 Permit To Work System

A written permit to work is required for confined space entry, chemical disinfection of systems and tanks, hot works, electrical isolation and any work where the client's own permit system applies. Permits define the work, the hazards, the isolations, the controls, the competent persons involved and the hand-back conditions. Client permit systems take precedence on client sites, and delivery partners must comply with them.

9.2 Confined Space Entry

- Entry is avoided wherever possible, for example by cleaning from outside the tank using extended tools.
- Where entry is unavoidable, a specific confined space risk assessment, safe system of work and rescue plan are prepared in line with the Confined Spaces Regulations 1997 and ACoP L101.
- The atmosphere is tested with a calibrated multi-gas monitor before and throughout entry. Forced ventilation is provided where required.
- A minimum of two trained persons is present, including a dedicated top-person. Rescue equipment appropriate to the space is available at the point of entry.
- Operatives hold current confined space training appropriate to the risk classification, such as City & Guilds 6150 or equivalent.

9.3 Isolation And Reinstatement

All isolations of water, electrical and heating systems are identified, locked off and tagged. Reinstatement follows a documented sequence: system flushing, verification of disinfectant removal, temperature checks and, where specified, sampling. Hand-back to the client is confirmed in writing.

10. Hazardous Substances (COSHH)

10.1 Arrangements

- A COSHH register is maintained for each contract, listing every hazardous substance in use, together with its current Safety Data Sheet and COSHH assessment.
- Biological agents, including *Legionella pneumophila*, are assessed under COSHH as hazards arising from the work activity.
- Chemicals are transported in approved, labelled containers, secured in vehicles, and stored away from occupants, particularly children and vulnerable adults.
- Disinfection chemicals are dosed using calibrated equipment and verified with test kits. Chemicals must never be mixed. In particular, hypochlorite must never come into contact with acids, because this releases

chlorine gas.

- Spill kits, eyewash and first aid provision appropriate to the substances are carried to every disinfection task.
- Waste chemicals and contaminated materials are disposed of through licensed waste carriers in line with Stravica's Environmental Policy.

10.2 Principal Substances

Substance	Use	Key Hazards	Key Controls
Sodium hypochlorite	Tank and system chlorination	Corrosive; releases chlorine gas if mixed with acids	Goggles or face shield; chemical gloves; ventilation; segregated storage
Chlorine dioxide	Disinfection of systems and outlets	Toxic by inhalation; oxidising	Prepared strictly to manufacturer instructions; RPE as specified; ventilation
Silver-stabilised hydrogen peroxide	Alternative disinfection	Oxidising; eye and skin irritant	Goggles; gloves; segregated storage
Acid-based descalers	Shower head and outlet descaling	Corrosive; reacts with hypochlorite	Gloves; goggles; never used at the same time as chlorine products
Sodium thiosulphate	Dechlorination before discharge	Low hazard; can irritate	Gloves; follow Safety Data Sheet
Biological agents in water and sediment	Present during all water hygiene tasks	Infection (Legionella, Pseudomonas, Leptospira)	Aerosol control; FFP3 where required; hygiene; health surveillance

11. Personal And Respiratory Protective Equipment

PPE is provided free of charge to all workers, including limb (b) workers, in line with the PPE at Work Regulations 1992 as amended in 2022. PPE is selected according to the RAMS and COSHH assessments and is maintained, stored and replaced as required. Minimum PPE for Stravica water hygiene contracts is set out below.

Task	Minimum PPE And RPE
All site work	Safety footwear with anti-slip soles, high-visibility clothing where required by the site, photo ID, nitrile gloves
Temperature monitoring and flushing	Nitrile gloves; heat-resistant gloves at calorifiers; eye protection where splash risk exists
Legionella sampling	Nitrile gloves; eye protection; FFP3 respirator where aerosol cannot be controlled or the system is known to be positive
Tank cleaning and disinfection	Chemical-resistant gloves; goggles or face shield; waterproof overalls and boots; FFP3 or a respirator rated for the chemical in use
Shower descaling and disinfection	Chemical-resistant gloves; goggles; FFP3 respirator
Confined space entry	As specified in the confined space assessment, which may include harness, breathing apparatus and a personal gas monitor

Task	Minimum PPE And RPE
Remedial works and hot works	Gloves; eye protection; hearing protection for power tools; fire-resistant gloves for brazing

11.1 Face-Fit Testing

All tight-fitting RPE is face-fit tested by a competent tester, for example one accredited under the Fit2Fit scheme, before first use and whenever the wearer's face shape or the RPE model changes. Wearers must be clean-shaven where the face seal is required. Fit test records are held for every operative.

12. Emergency Preparedness And Response

12.1 Arrangements

Emergency arrangements are confirmed with the client at mobilisation and included in site-specific RAMS. They cover fire, first aid, chemical spills or releases, confined space rescue, scalding, flooding and escape of water, discovery of asbestos, and violence or aggression.

Emergency	Immediate Response
Chemical splash to eyes or skin	Irrigate immediately with clean water or eyewash for at least 15 minutes. Remove contaminated clothing. Seek medical attention, taking the Safety Data Sheet. Report.
Chlorine gas release	Stop work. Evacuate and ventilate the area. Prevent re-entry. Call 999 if anyone is affected. Inform the client's site contact. Report.
Confined space emergency	Activate the rescue plan. The top-person must not enter without the planned rescue equipment. Call 999. Start first aid.
Scald injury	Cool the burn under cool running water for 20 minutes. Call 999 for serious burns. Isolate the source. Report.
Major water leak or flooding	Isolate the supply. Protect electrics. Inform the client. Contain the water. Report.
Suspected asbestos disturbed	Stop work. Leave and seal the area. Prevent access. Inform the client and Stravica. Do not resume until the material is assessed.
Adverse result with immediate risk to vulnerable occupants	Notify the client immediately by telephone and recommend outlet restriction, point-of-use filtration or disinfection in line with Appendix C.

12.2 First Aid

Delivery partners ensure that operatives have access to first aid provision appropriate to the task and location, including trained first aiders and vehicle first aid kits with burns dressings and eyewash. Use of client first aid facilities is agreed at mobilisation.

12.3 Fire Safety

Operatives familiarise themselves with site fire procedures and escape routes on arrival. Hot works are subject to permit. Stravica premises are covered by a fire risk assessment reviewed annually.

12.4 Business Continuity

Stravica maintains arrangements to continue critical statutory monitoring if a delivery partner fails or is unable to attend. These include access to alternative approved delivery partners so that legally required monitoring intervals are protected.

13. Training, Competence And Awareness

13.1 Competence Standard

ACoP L8 requires that those undertaking risk assessments and control activities are competent, meaning they have the necessary skills, knowledge and experience. Stravica verifies competence before any individual works on a Stravica contract and maintains a training matrix for every delivery partner workforce.

Role Or Task	Minimum Training And Competence
All site operatives	Site induction; Legionella awareness; COSHH awareness; asbestos awareness (Category A); manual handling; safeguarding awareness for occupied premises; CSCS or equivalent where required by the site
Water hygiene operatives (monitoring, flushing, PPM)	Accredited water hygiene operative or Legionella control training; temperature monitoring; TMV servicing where applicable
Sampling operatives	Accredited Legionella sampling training aligned to BS 7592; chain of custody procedure
Legionella risk assessors	Accredited Legionella risk assessment qualification aligned to BS 8580-1; demonstrable experience of comparable premises; BS 8580-2 training for healthcare work
Tank cleaning and disinfection operatives	Accredited cleaning and disinfection training; confined space training (City & Guilds 6150 or equivalent); EUSR National Water Hygiene card where required by the client or water undertaker
Remedial works operatives	Recognised plumbing qualification; Water Regulations training; hot works training where applicable
Supervisors and Contract Managers	SMSTS or SSSTS (or equivalent) where works fall under CDM; Responsible Person-level Legionella training; incident investigation
Work at height and access equipment	Ladder and stepladder training; PASMA or IPAF where towers or MEWPs are used
RPE wearers	Face-fit test; RPE use and maintenance
Healthcare settings	HTM 04-01 awareness; infection prevention and control; augmented care protocols

13.2 Induction

All persons working on a Stravica contract receive an induction covering this policy, the contract scope, site rules, emergency procedures, the escalation route for adverse results, safeguarding, GDPR and the right to stop work. Induction is recorded.

13.3 Refresher Training

Refresher training follows the validity periods of each qualification, and in any case at intervals not exceeding three years. Earlier refresher training is given after incidents, changes in legislation or guidance, or where monitoring identifies a competence gap.

13.4 Verification

Competence is verified through certificates, which are checked for authenticity and expiry, through records of experience and through on-site observation during Stravica audits. Expired training results in removal from Stravica contracts until it is renewed.

14. Delivery Partner Selection And Management

14.1 Selection Criteria

Stravica appoints only specialist water hygiene delivery partners who meet the following minimum criteria. Compliance is evidenced and recorded before appointment (see Appendix E).

- Current membership of the Legionella Control Association for the services to be delivered.
- Use of UKAS ISO/IEC 17025-accredited laboratories for all microbiological analysis.
- Employers' Liability, Public Liability and Professional Indemnity insurance at or above the levels required by the client contract.
- A written health and safety policy, current health and safety accreditation such as an SSIP-recognised scheme, and a satisfactory safety record over the previous three years, including RIDDOR history and any enforcement action.
- Evidence of workforce competence aligned to Section 13.
- Willingness to provide complete, unredacted, site-specific RAMS for client review. Redacted or generic RAMS are not accepted under any circumstances.
- Verifiable references and examples of comparable contracts.
- Compliance with Stravica's Modern Slavery, Anti-Bribery, Equality & Diversity, Data Protection and Environmental policies.

14.2 Mobilisation

Before work starts on any contract, Stravica and the delivery partner hold a mobilisation meeting to confirm the scope, the client's written scheme, site access, permit systems, emergency arrangements, named personnel, uniform and identification, resident and occupant communications, reporting formats and KPIs. Site-specific RAMS are submitted to Stravica, reviewed and accepted before submission to the client.

14.3 Monitoring And Control

Control	Frequency
Review of task completion and results data	Monthly, or as each task is completed for adverse results
Stravica site audit or observation	At least quarterly per contract, and following any incident

Control	Frequency
Contract review meeting covering safety, quality and KPIs	Monthly during the first three months, then quarterly
Re-verification of insurance, accreditations and training	On expiry, and in any case annually
Delivery partner performance review	Annually

14.4 Non-Compliance

Unsafe acts or conditions result in immediate suspension of the affected work. Non-compliance is managed through corrective action plans with defined deadlines. Serious or repeated non-compliance, falsification of records or failure to report incidents leads to removal from the contract and from Stravica's approved delivery partner register. Stravica remains accountable to the client throughout and will put alternative delivery arrangements in place.

15. Working In Occupied And Sensitive Premises

Much of Stravica's work takes place in homes, hospitals, care settings and schools, where occupants may be elderly, immunocompromised, disabled or children. The following minimum standards apply.

- Identification and uniform: all operatives wear branded uniform and carry photo ID, which they present on arrival.
- Resident and occupant communications: at least 48 hours' written notice is given of planned visits or loss of water supply, unless the client agrees otherwise. Notices explain the purpose of the visit and give a contact number.
- Vulnerable occupants: client information on vulnerable residents is used to plan visits. Alternative water supplies are arranged where supply is interrupted.
- Safeguarding: operatives working in healthcare, education or with vulnerable adults hold the level of DBS check (or PVG membership in Scotland) required by the client and follow the client's safeguarding procedures. Concerns are reported immediately.
- Infection prevention: in healthcare settings, operatives follow the client's infection prevention and control requirements and augmented care protocols.
- Data protection: resident and site data are handled in line with Stravica's Data Protection & GDPR Policy, and are used only for the purposes of the contract.
- Access failures: failed visits are recorded with evidence, such as a calling card or photograph, and reported to the client within one working day.
- Courtesy: operatives respect occupants' homes, protect floors and furnishings, leave work areas clean and safe, and reinstate outlets and fittings before leaving.

16. Health Surveillance And Wellbeing

16.1 Occupational Health

- Operatives who may be exposed to Legionella carry a Legionnaires' disease awareness card and are instructed to seek medical advice, and to mention their occupation, if they develop flu-like or pneumonia-like symptoms.
- Leptospirosis awareness cards are issued to operatives who work in tanks and drainage-related areas.
- Health surveillance is arranged where required by COSHH or by noise and vibration assessments, for example respiratory or skin surveillance for regular users of chlorine-based products.
- Individuals at increased risk, such as those who are immunocompromised or have chronic respiratory conditions, are encouraged to disclose this confidentially so that suitable adjustments can be made.
- Health records are confidential and are handled in line with UK GDPR.

16.2 Mental Health And Wellbeing

Stravica recognises mental wellbeing as integral to safety. Stress risk assessments are completed where required. Workloads and travel are planned to avoid fatigue, particularly for operatives covering large geographical areas, and workers are signposted to support services.

16.3 Driving For Work

Many water hygiene tasks involve driving between sites. Delivery partners must ensure that vehicles are roadworthy and insured for business use, that loads and chemicals are secured, that drivers hold valid licences, and that schedules do not require excessive driving hours. Handheld phone use while driving is prohibited.

17. Incident Reporting And Investigation

17.1 What Must Be Reported

- All accidents and injuries, however minor.
- Near misses and unsafe conditions.
- Dangerous occurrences, including the accidental release of a biological agent likely to cause severe human illness.
- Cases of occupational disease, including any diagnosis of legionellosis or leptospirosis in a worker.
- Chemical spills or releases, unplanned loss of supply, scald incidents and damage to client property.
- Adverse sampling results, out-of-specification monitoring results and failures to complete statutory monitoring. These are reported as compliance events through the escalation route in Appendix C.

17.2 Reporting Timescales

Event	Report To Stravica	Report To Client
Fatality, specified injury or dangerous occurrence	Immediately by telephone	Immediately
Any other injury, incident or chemical release	Same day	Within 24 hours

Event	Report To Stravica	Report To Client
Near miss or unsafe condition	Within 24 hours	In the monthly report, or sooner if it affects client safety
Adverse sampling or monitoring result	As set out in Appendix C	As set out in Appendix C

17.3 RIDDOR

Stravica ensures that reportable incidents arising from work on its contracts are reported to the HSE in line with RIDDOR 2013 by the responsible employer, and verifies that reports have been made. The procedure is detailed in Appendix A.

17.4 Investigation And Learning

All incidents are investigated in proportion to their actual and potential severity to identify immediate, underlying and root causes. Corrective actions are assigned owners and deadlines and are tracked to closure. Lessons learned are shared with all delivery partners and, where relevant, with the client.

18. Records And Information Management

Accurate records are central to legal compliance for both Stravica and its clients. ACoP L8 requires that records of risk assessments, monitoring, inspections and the results of the written scheme are retained for at least five years. Stravica applies the following minimum retention periods, or longer where the client contract requires it.

Record	Minimum Retention
Legionella risk assessments and written scheme documents	For as long as current, and at least five years after being superseded
Monitoring, inspection, cleaning and disinfection records	Five years
Sampling records, laboratory certificates and chain of custody	Five years
Accident book entries and investigation reports	At least three years from the date of entry; investigation reports five years
RIDDOR reports	At least three years
COSHH health surveillance records	40 years
Training and competence records	For the duration of the engagement plus six years
Delivery partner pre-qualification and audit records	For the duration of the engagement plus six years

Records are provided to clients in the agreed format, normally within five working days of task completion and in the monthly contract report. Records remain available for inspection by enforcing authorities on request.

19. Performance Monitoring, Audit And KPIs

19.1 Key Performance Indicators

KPI	Target
RIDDOR-reportable incidents on Stravica contracts	Zero
Site-specific RAMS accepted before work starts	100%
Statutory monitoring tasks completed within the scheduled interval	100% (excluding documented client access failures)
Adverse results notified to the client within the Appendix C timescale	100%
Reports and certificates issued within five working days	At least 95%
Operatives with in-date training for the task they are performing	100%
Audit corrective actions closed by their due date	At least 90%
Near-miss reporting	Encouraged and tracked as a positive safety culture indicator

19.2 Inspections And Audits

- Point-of-work checks by delivery partner supervisors on every task.
- Stravica site audits and task observations at least quarterly per contract.
- Annual audit of each delivery partner's management system, training records and RAMS.
- Annual internal review of Stravica's own compliance with this policy.

19.3 Management Review

The Director reviews health and safety performance at least quarterly, covering KPIs, incidents, audit findings, client feedback, delivery partner performance and changes in legislation or guidance. A formal annual management review sets objectives for the following year. Reviews and actions are minuted.

20. Communication, Consultation And Continuous Improvement

20.1 Communication

Health and safety information is communicated through inductions, pre-start briefings, toolbox talks, safety alerts, contract review meetings and written bulletins. Changes in legislation or guidance affecting water hygiene, such as revisions to HSG274 or the British Standards, are communicated to all delivery partners with any required changes to method.

20.2 Consultation

Stravica consults with workers and delivery partners on matters affecting their health and safety, in line with the Health and Safety (Consultation with Employees) Regulations 1996. Feedback from operatives on RAMS, equipment and site conditions is actively sought and used.

20.3 Client And Regulator Communication

Clients receive timely, transparent information on any health and safety issue affecting delivery, including adverse results, incidents and access problems. Stravica will be open and honest with regulators and clients when things go wrong.

20.4 Continuous Improvement And Policy Review

Improvement actions are logged, assigned owners and tracked to completion. This policy is reviewed at least annually, and sooner following a significant incident, enforcement action, organisational change, or change in legislation or guidance.

Appendix A – Accident Reporting And Investigation Procedure

A1. Purpose

To ensure that all accidents, incidents, dangerous occurrences, near misses and cases of occupational disease on Stravica contracts are reported, recorded, investigated and acted upon consistently and in compliance with RIDDOR 2013.

A2. Immediate Actions

1. Make the area safe. Stop the activity, isolate chemicals or plant, and prevent further harm.
2. Provide first aid and call 999 if the injury is serious or life-threatening.
3. Inform the supervisor, the Delivery Partner Contract Manager and Stravica in line with Section 17.2.
4. Preserve the scene of any serious incident unless it must be disturbed to prevent further harm.
5. Inform the client's site contact.

A3. RIDDOR Notification

Category	Examples Relevant To Water Hygiene Work	Deadline
Fatality or specified injury	Fracture from a fall from a ladder or loft hatch; loss of consciousness from chlorine gas or an oxygen-deficient tank; serious burn or scald covering more than 10% of the body	Notify the HSE without delay; full report within 10 days
Over-seven-day incapacitation	Back injury from lifting a tank lid causing more than seven consecutive days off normal duties	Within 15 days of the incident
Occupational disease	Legionellosis or leptospirosis diagnosed in a worker and attributed to occupational exposure; occupational dermatitis from disinfectants	As soon as a written diagnosis is received
Dangerous occurrence	Accidental release of a biological agent likely to cause severe human illness; collapse of access equipment; electrical short circuit causing fire	Without delay; report within 10 days
Gas incidents	Not normally applicable to water hygiene activities; reported where they arise	Within 14 days

A4. Investigation Steps

1. Initial review: an immediate fact-finding review by the Delivery Partner Contract Manager.
2. Evidence gathering: photographs, witness statements, permits, RAMS, monitoring data, gas monitor logs, equipment records and training records.
3. Root cause analysis: identification of immediate, underlying and root causes using a structured technique such as the "5 Whys".
4. Corrective action plan: actions, owners and deadlines agreed with Stravica.
5. Management review: the Director reviews the findings within 14 days.
6. Closure: actions verified as complete and lessons learned shared with all delivery partners.

A5. Information Recorded For Every Incident

Field	Content Required
Reference, date and time	Unique incident reference and when the event occurred
Location and contract	Site address, area of the building, water system or asset involved
Persons involved	Names, employer and role of injured persons and witnesses
Type of event	Injury, near miss, dangerous occurrence, disease, chemical release, property damage or compliance event
Description	Factual account of what happened, the task being performed and the conditions
Injury or harm	Nature of the injury, treatment given and whether the person was hospitalised
Immediate actions	Steps taken to make the area safe and prevent recurrence
RIDDOR status	Whether reportable, by whom, the date and the HSE reference
Root cause and actions	Findings, corrective actions, owners and dates
Sign-off	Reviewed by the Delivery Partner Contract Manager and the Stravica Director, with dates

Appendix B – COSHH Assessment Requirements

B1. Purpose

To ensure that every hazardous substance and biological agent encountered on Stravica contracts is identified, assessed and controlled in compliance with COSHH 2002.

B2. Responsibilities

- Delivery partners maintain a COSHH register and assessments for every contract and submit them with the RAMS.
- Stravica reviews COSHH assessments at mobilisation and at least annually.
- Operatives follow the control measures and use PPE and RPE as specified.

B3. Content Of Each Assessment

Field	Description
Substance or agent	Product name as listed on the Safety Data Sheet, or the biological agent (for example Legionella pneumophila)
Supplier	Manufacturer and emergency contact details
Intended use	For example tank chlorination, outlet disinfection, descaling, dechlorination or sampling
Form and concentration	Liquid, gas, powder or tablet; supplied and in-use concentrations
Hazard classification	GB CLP hazard statements and pictograms
Exposure routes	Inhalation of aerosol or gas, skin or eye contact, ingestion, or entry through cuts

Field	Description
Workplace exposure limits	From HSE EH40 where applicable
Health effects	Short-term and long-term effects, including sensitisation
Control measures	Elimination or substitution considered; ventilation; dosing equipment; segregation; signage; exclusion of occupants
PPE and RPE	Specific glove material, eye protection, respirator type and filter
Storage and transport	Segregation of oxidisers and acids; secured vehicle storage; quantity limits
First aid and emergency	Measures taken from the Safety Data Sheet; spill response
Disposal	Neutralisation and dechlorination; consented discharge or licensed waste carrier
Health surveillance	Whether required, and its type
Assessor and review	Competent assessor, date and next review date

Appendix C - Monitoring And Sampling Result Escalation Matrix

This matrix sets the minimum notification and response standards for Stravica contracts. Action levels for Legionella in hot and cold water systems follow HSG274 Part 2. Where the client's written scheme or Water Safety Plan sets stricter levels or timescales, the client's requirements apply. Responsibility for deciding on remedial action rests with the client's Duty Holder, advised by Stravica.

Finding	Interpretation (HSG274 Part 2)	Stravica Notification	Recommended Response
Legionella not detected or below 100 cfu/l	System under control	Routine report	Continue the written scheme
Legionella between 100 and 1,000 cfu/l	If only one or two samples are positive, resample. If the majority are positive, the system may be colonised at a low level.	In writing within 24 hours of the result	Resample. If confirmed, review control measures and the risk assessment. Consider disinfection.
Legionella above 1,000 cfu/l	Significant colonisation	By telephone the same day, confirmed in writing within 24 hours	Resample. Immediately review controls and the risk assessment. Carry out remedial action, which may include disinfection. Consider restricting outlets or fitting point-of-use filters, particularly where occupants are vulnerable.
Any Legionella detected in augmented care or healthcare settings	Assessed against the client's Water Safety Plan and HTM 04-01	By telephone the same day to the client's Responsible Person (Water)	In line with the Water Safety Group decision

Finding	Interpretation (HSG274 Part 2)	Stravica Notification	Recommended Response
Pseudomonas aeruginosa detected in augmented care	Assessed against HTM 04-01 Part C	By telephone the same day	In line with the Water Safety Group decision
Hot or cold water temperatures outside the control standard	Loss of temperature control	In writing within 24 hours; same day where vulnerable occupants are affected	Investigate the cause, for example calorifier settings, balancing or heat gain. Re-test. Raise remedial works.
Tank in poor condition (contamination, vermin, no lid)	Risk to water quality	Same day	Clean, disinfect and repair. Consider replacing the tank.
Statutory monitoring missed because of access failure	Compliance gap	Within one working day	Reschedule within the statutory interval and agree access with the client

Important

Results are reported exactly as received from the laboratory. Stravica never delays or withholds an adverse result, whatever the commercial or reputational implications.

Appendix D – Water Hygiene Control Reference

Quick reference for operatives and contract managers, drawn from HSG274 Part 2. Site-specific written schemes take precedence where they are stricter.

Parameter	Standard
Hot water storage (calorifiers)	At least 60°C
Hot water distribution	At least 50°C at outlets within one minute; at least 55°C in healthcare premises
Cold water storage and distribution	Below 20°C; outlets below 20°C within two minutes
Water temperature range that supports Legionella growth	20°C to 45°C
Thermal disinfection	At least 70°C at outlets, held for the duration specified in the method statement, with occupant protection
Chemical disinfection of storage tanks	Typically 50 mg/l free chlorine for at least one hour, or as specified in the approved method
Cold water storage tank inspection	Annually; cleaned and disinfected where inspection shows it is needed
Little-used outlets	Flushed at least weekly
Sentinel outlet monitoring	Monthly
Showers and spray hoses	Cleaned, descaled and disinfected quarterly, or as determined by the risk assessment

Parameter	Standard
Risk assessment review	Regularly and whenever there is reason to suspect it is no longer valid, for example after system changes, changes in use, adverse results or an outbreak

Appendix E - Delivery Partner Pre-Qualification Checklist

Each item must be evidenced and verified before a delivery partner is added to the Stravica approved register.

Requirement	Evidence Required
Company identity	Companies House registration, VAT registration and confirmation of directors
Legionella Control Association membership	Current LCA certificate covering the services to be delivered
Laboratory accreditation	UKAS ISO/IEC 17025 schedule for the laboratory used, covering Legionella and other required parameters
Insurance	Employers' Liability, Public Liability and Professional Indemnity certificates meeting contract levels
Health and safety management	Signed health and safety policy; SSIP-recognised accreditation or equivalent; sample RAMS
Safety record	RIDDOR statistics and any enforcement notices or prosecutions for the last three years
Competence	Training matrix and certificates for proposed operatives, assessors and supervisors
RAMS	Agreement to provide full, unredacted, site-specific RAMS for every contract
Quality and environmental management	Quality and environmental policies; ISO 9001 or ISO 14001 certificates if held; waste carrier registration where applicable
Safeguarding and vetting	DBS or PVG checking process for staff working in sensitive premises
Data protection	ICO registration and GDPR arrangements
Ethical compliance	Confirmation of compliance with Stravica's Modern Slavery, Anti-Bribery and Equality policies
References	At least two verifiable references from comparable water hygiene contracts

Appendix F – Glossary

Term	Meaning
ACoP L8	HSE Approved Code of Practice for the control of Legionella bacteria in water systems
Augmented care	Healthcare settings where patients are at increased risk from water-borne pathogens, as defined in HTM 04-01
cfu/l	Colony forming units per litre, the unit used to express bacterial counts
Delivery partner	A specialist subcontractor appointed by Stravica to deliver services under Stravica's control
Duty Holder	The employer or person in control of premises, who holds legal responsibility for Legionella risk management
HSG274	HSE technical guidance on the control of Legionella in evaporative cooling, hot and cold water and other risk systems
LCA	Legionella Control Association, the industry body for water hygiene service providers
RAMS	Risk Assessment and Method Statement
Responsible Person	The competent person appointed by the Duty Holder to manage Legionella control day to day
Sentinel outlets	The first and last outlets on a hot or cold water distribution circuit, used for routine monitoring
TMV	Thermostatic mixing valve, which blends hot and cold water to reduce scalding risk
UKAS	United Kingdom Accreditation Service
Written scheme	The Duty Holder's documented plan for preventing or controlling Legionella risk

Stravica Ltd

- 20-22 Wenlock Road, London N1 7GU
- info@stravica.uk | www.stravica.uk
- Company No. 16756638