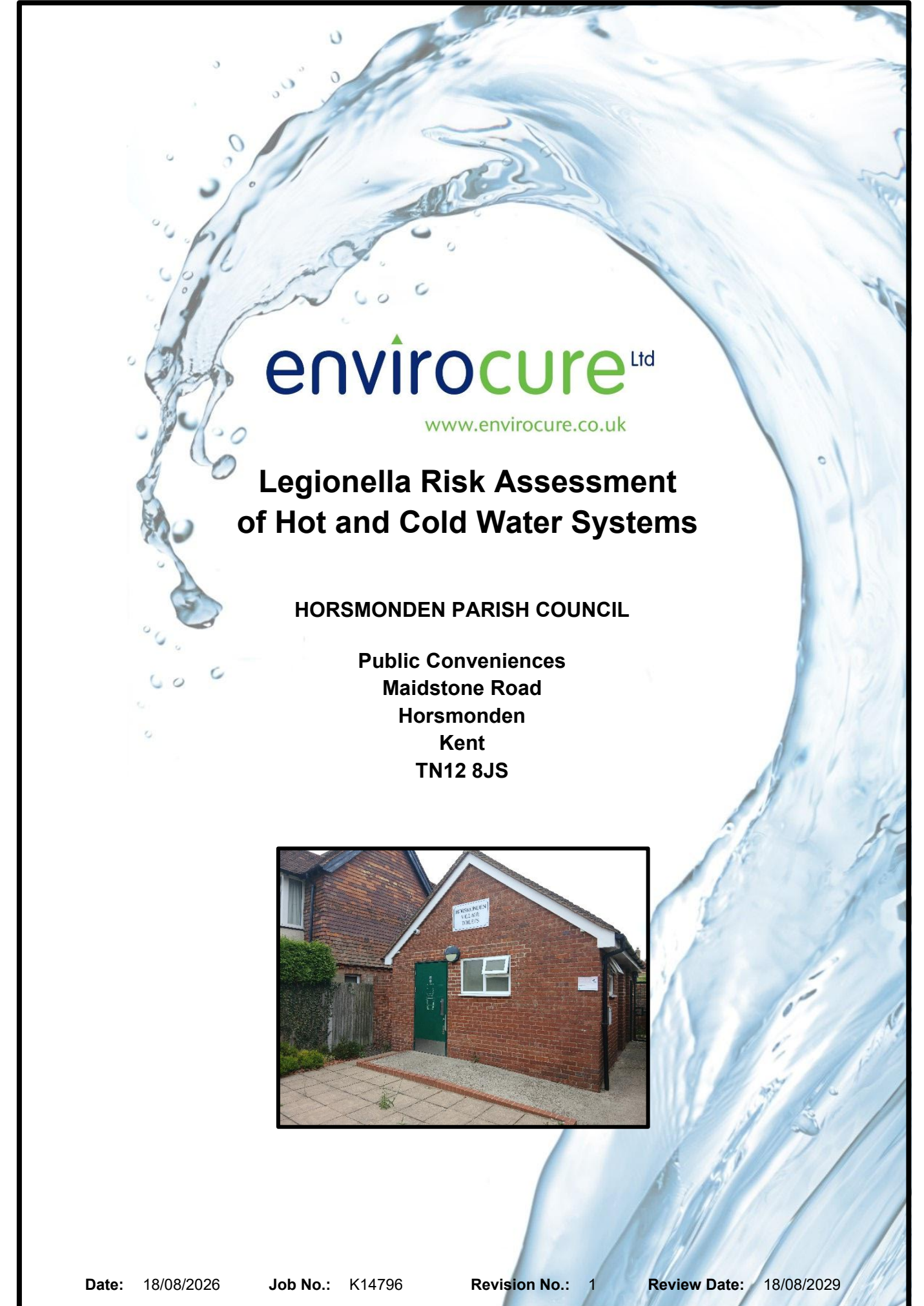


A large, dynamic splash of water in shades of blue and white, forming a circular shape around the central text.

envirocure Ltd

www.envirocure.co.uk

Legionella Risk Assessment of Hot and Cold Water Systems

HORSMONDEN PARISH COUNCIL

**Public Conveniences
Maidstone Road
Horsmonden
Kent
TN12 8JS**



Contents

Risk Assessment Details	2
Executive Summary	3
Executive Summary Calculations	5
Recommendations	6
Building Services	7
Sources of Information	8
Assessment Equipment Asset Register.....	9
Sources of Reference and Guidance	10
Legionella Legislations and Guidance	11
Client Responsibilities Regarding Legionella.....	12
Definitions of Key Personnel	14
Legionella Bacteria Overview	15
Important Information	16
Hot and Cold System Risk Summary	17
Hot and Cold Water System Risk Potential	18
Hot and Cold Water System Risk Potential	19
Hot and Cold Water Systems Asset Condition Reports.....	20
Low Storage Point of Use Heaters	21
Expansion Vessel and Hydraulic Accumulators	22
Hot and Cold Water System Surveys	23
General Hot and Cold Water Outlets.....	24
Hot and Cold Water System Schematic	25
Sampling Plans and Procedures	26
Recommended Sampling Plan	27
Management Control	28
Documentation	30
Written Scheme Management Systems and Records	33
Hot and Cold System Written Scheme of Control.....	34
Glossary	37
Summary of Services	40

Risk Assessment Details

This Risk Assessment has been undertaken on behalf of: -

Lucy Noakes
Horsmonden Parish Council
Public Conveniences
Maidstone Road
Horsmonden
Kent
TN12 8JS

Company	Envirocure Limited
Date of Survey	18 th August 2026
Site Surveyor / Consultant	Robbie Taylor
Signature	
Auditor Checked	Lee Austin
Auditor Signature	

Assessor Qualifications

Robbie completed the Water Management Society 3 Day Legionella Risk Assessor course in 2011, and since then has undertaken Legionella Risk Assessments on a vast array of sites including the following: -

- Major hospitals
- Day centres for vulnerable people
- Children's centres
- Schools from primary through to secondary
- Nurseries
- Office blocks
- Universities
- Dentist and doctors' surgeries
- Veterinary clinics
- Holiday parks
- Student accommodation blocks
- Nurses' accommodation blocks
- Housing association sites
- Restaurants and take away franchises
- Shopping centres
- Canal barges
- Churches and cathedrals
- Football stadiums

Robbie has worked in all aspects of the water hygiene industry for the last 17 years and has completed a vast array of works including cold water storage tank replacements, mains conversions, tank cleans, TMV installs and servicing, plumbing works, chemical dosing (closed system and potable water), cooling tower cleans, refurbishment works, weekly checks, installs and removals, temperature monitoring, descaling of calorifiers, shower descales, and internal calorifier inspections.

Robbie has also completed the following qualifications: -

- Legionella Control within Hot and Cold Water Systems (City and Guilds)
- Legionella Management for Water Systems (HTM 04-01) (City and Guilds)
- Servicing and Testing Requirements of Thermostatic Mixing Valves (City and Guilds)
- Legionella Control within Evaporative Cooling Systems (City and Guilds)
- G3 Unvented Water Cylinder

Executive Summary

This summary is designed to provide an at a glance overview of the contents of the assessment.

Please note the risk levels detailed here provide an overall rating of multiple areas of potential hazard regarding Legionella. Levels of risk for individual areas will differ and the duty holder must ensure this document is read in its entirety to ensure all faults and possible dangers are fully understood and relevant remedial actions are implemented to ensure the risk from Legionella is as low as reasonably practicable. Information regarding how these scores are calculated are detailed throughout the document.

The inherent Legionella risk rating for this site, with no controls in place, is: -

Low

The most significant risk systems are mains & DHWS 1 with a **Medium** rating.

The potential (residual) Legionella risk rating for this site is: -

Low

The following summarises the management systems in place: -

Policy

A clear indication of the management's approach to Legionella control is set, with all policies and procedures in place and available.

Management Team

A competent, trained management team was identified, using external consultants to augment them with well-structured management staff.

Control Procedures

All relevant ACoP L8 tasks are undertaken with historic evidence to provide a comprehensive level of protection to the organisation.

Data Review

There is evidence to support that regular reviews and attention to the written scheme of control is taking place. The responsible person should ensure that issues are conveyed into the management system and resources are allocated appropriately.

Based on the management systems witnessed, the potential risk to the organisation should a Legionella death or outbreak occur is: -

Low

Key recommendations from the assessment include

- No recommendations have been made as part of this assessment

Assessor's Comments

This site has been assessed as a low risk.

In order to continue to minimise the risk of Legionella proliferation it is to be ensured that all recommendations in this document are completed within a suitable timeframe, i.e., very high risk items - immediate action required, high risk items - action required within 3 months, medium risk items - action required within 6 months, and low risk items - action required within 12 months.

Areas of Immediate Concern

The following areas were identified as being matters of immediate concern requiring urgent action. This information was provided to the client as an interim recommendation prior to this report being issued and are included within the recommendations in this document.

None identified as part of this assessment.

Recommended Review Date

August 2029

Review dates are calculated based on the potential Legionella risk rating: -

Score	Review Duration
Low	3 Years
Medium	2 Years
High	1 Year
Very High	6 Months

Executive Summary Calculations

To determine the classification in the Executive Summary section, calculations were made as indicated below.

Site Potential Risk

To calculate the site potential risk, each system is allocated a numerical value based on the following: -

System Risk	Risk Score
Low Risk Systems	1
Medium Risk Systems	3
High Risk Systems	5
Very High Risk Systems	9

The addition of the systems is then divided by the number of systems, to give an average value between 1 and 9. The site potential risk is then calculated by comparing this figure against the table below.

Site Potential Risk	Average System Score
Low	1-2
Medium	3-4
High	5-8
Very High	9

Actual Risk

The actual risk of a building takes into consideration the potential risk of the property, and the control systems in use to manage this risk.

Poor management systems amplify the risk of Legionella and are often the key contributor to legal action.

As the system contains water than can come in to contact with individuals there is an inherent Legionella risk. If you implement all the recommendations from this report we would consider the risk as low as reasonably practicable.

The following table calculates this risk by multiplying the potential risk by the average management control from the management statements within the Executive Summary. Please note that a management regime is more than just collecting the data required within ACoP L8, and all areas should be considered as vital to an effective management scheme of control.

		Management Control		
		Good Control	Partial Control	Poor / No Control
Potential Site Risk	Low	LOW	LOW	MEDIUM
	Medium	LOW	MEDIUM	MEDIUM
	High	MEDIUM	MEDIUM	HIGH
	Very High	MEDIUM	HIGH	VERY HIGH

Recommendations

Based on the findings of this assessment no recommendation have been highlighted, the current control regime is kept up to date and remedial action from the previous assessment have been completed.

Site: HORSEMONDEN PUBLIC CONVINIENCES

Date: 18/08/2026

Job No.: K14796-01

Head Office: Unit 50-51 Riverside Estate, Sir Thomas Langley Road, Medway City Estate, Rochester, ME2 4DP

Scotland Office: Suite 51 Grovewood Business Centre, Strathclyde Business Park, Bellshill, Lanarkshire, ML4 3NQ

Kent: 01634 726716 | **Scotland:** 01698 844843 | admin@envirocure.co.uk | sales@envirocure.co.uk

Building Services

Building Name	Public Conveniences
Building Address	Maidstone Road, Horsmonden, Kent, TN12 8JS
Description of building and its use	This is a single storey building used as public toilets This building consists of toilet facilities only.
Description of the hot and cold water systems present	The hot and cold water systems identified in this building are pressurised with non circulation of hot water services. The mains enters the building feeding all cold water outlets in addition to a point of use water heater which in turn feeds all hot water outlets.
Type of person identified to use this building	This building is used by site staff, contractors, children within all age ranges, members of the public. As a result these groups are likely to be immunosuppressed, advanced in age or otherwise susceptible to infection from Legionella bacteria.
Assessment limitations and systems identified but not within the scope of this risk assessment	None.

Sources of Information

Site Contact Name	Lucy Noakes
Site Contact Title	Clerk
Site Drawings and Records	Available

Assessment Equipment Asset Register

	Description	No. of Assets
Calorifiers and Water Heaters	Point of Use Heaters	1
Hot and Cold Water System Key Assets	Sinks / Hand Basins / Baths	3
	TMVs	3
	Expansion Vessels	1

Sources of Reference and Guidance

In 1991, the Approved Code of Practice and Guidance (L8) “Legionnaires Disease: *The control of Legionella bacteria in water systems*” was first published to address the issue of Legionella in the workplace.

This document was updated in 1995 and 2000 to address improvements in our understanding of the bacterium Legionella pneumophila and related bacteria.

In 2013 this guidance was given a new format to include HSG274. Many of the common building services systems not addressed in detail within the first 3 editions was reviewed and clarification given as to their designation and appropriate methods of operation and management.

ACoP L8 is produced to give in-depth practical guidance on the requirements of current legislation with regard to the risk of exposure to Legionella bacteria, and more specifically dealing with the Health and Safety at Work etc. Act 1974 and the Control of Substances Hazardous to Health Regulations (COSHH) 2002. The code also gives guidance on compliance with the relevant parts of the Management of Health and Safety at Work Regulations 1999 (MHSWR) and acknowledges additional sources of guidance including British Standards and HTM publications.

This Legionella Risk Assessment has been compiled to ascertain the risk of Legionella colonisation of hot and cold water systems in accordance with the HSE ‘Approved Code of Practice (ACoP) and Guidance – Legionnaires’ Disease: *The Control of Legionella Bacteria in Water Systems (L8) 4th Edition*’, ‘HSG274 Legionnaires’ Disease Part 2: *The Control of Legionella Bacteria in Hot and Cold Water Systems (2014)*’, ‘HSG274 Legionnaires’ Disease Part 3: *The Control of Legionella Bacteria in Other Risk Systems (2013)*’ and British Standard ‘BS8580-1:2019 Water Quality – Risk Assessments for Legionella Control. Code of Practice’.

Healthcare Premises

Healthcare premises are not only covered by ACoP L8 but also by HTM04-01: Safe water in healthcare premises. The duty holder has a requirement to establish a Water Safety Group (WSG) and produce a Water Safety Plan (WSP). This includes, but goes far beyond, the Legionella risk assessment.

Envirocure’s Legionella risk assessments are produced in line with ACoP L8 and HSG 274. Any considerations for additional obligations from HTM04-01 are solely the responsibility for duty holder.

Legionella Legislations and Guidance

HSE ACoP L8 Guidance 57 recommends that Legionella Control Association (LCA) criteria be used to ensure the correct levels of service. Envirocure have Legionella Control Association membership for the Legionella control services offered and therefore can demonstrate full competence. Envirocure's Legionella Control Association membership certificate and the Legionella Control Association's Code of Conduct are available on our website, www.envirocure.co.uk. Details of the Legionella control services offered and our membership can be found on the Legionella Control Association's website, www.legionellacontrol.org.uk.

We draw your attention to the current legislations and guidelines: [*Approved Code of Practice \(ACoP\) and Guidance – Legionnaires' Disease: The Control of Legionella Bacteria in Water Systems \(L8\) 4th Edition*](#). The ACoP "gives practical advice on the requirements of the '[*Health & Safety at Work etc. Act 1974*](#)', '[*The Management of Health and Safety at Work Regulations 1999*](#)' and '[*The Control of Substances Hazardous to Health Regulations \(COSHH\) 2002*](#)', concerning the risks from Legionella bacteria". Legionella control tasks are identified as per '[*HSG274 Legionnaires' Disease Part 2: The Control of Legionella Bacteria in Hot and Cold Water Systems \(2014\)*](#)' and '[*HSG274 Legionnaires' Disease Part 3: The Control of Legionella Bacteria in Other Risk Systems \(2013\)*](#)'. Information regarding the duty holders' obligations with regards to Legionella can be found in the HSE leaflet '[*INDG458 Legionnaires' Disease: A Brief Guide for Dutyholders \(2012\)*](#)'.

Information regarding evaporative cooling systems can be found within '[*HSG274 Legionnaires' Disease Part 1: The Control of Legionella Bacteria in Evaporative Cooling Systems*](#)'.

Client Responsibilities Regarding Legionella

There are several key responsibilities that the duty holder has a legal duty to address via the management team and responsible persons they appoint. These are listed below: -

Legionella Risk Assessment Services

- The duty holder must ensure there is a Legionella risk assessment record that includes all systems where water is stored or used in any premises controlled by the duty holder (The Control of Substances Hazardous to Health Regulations (COSHH) 2002). This risk assessment should be regularly reviewed to ensure it is valid and reassessed when required (refer to ACoP L8 paragraphs 32 and 47).
- Any invitation to potential service providers to quote / tender for Legionella risk assessment services should have a clear scope of work defined by the duty holder or their representative.
- Make reasonable enquiries of the service provider regarding proof of competence of individuals involved in carrying out the Legionella risk assessment e.g. provision by the service provider of: training records, competence evaluations, examples of previous work, etc.
- Schematic diagrams and asset registers should be available to inform and help the risk assessor (see ACoP L8 paragraphs 38 and 40). Pipework engineering drawings may be too detailed to allow simple communication of Legionella risk but schematic diagrams must show detail relevant to Legionella control.
- The findings of the risk assessment including the required corrective actions and the control measures should be implemented. The output from the scheme of control should be recorded and used in any subsequent review of risk.
- A written scheme of control should be produced and maintained and the output from this should be recorded and used in any subsequent review of risk.
- Regular reviews of the effectiveness of Legionella control activities should be carried out to verify the written scheme of control remains adequate.
- The duty holder should have change management procedures and / or regular review procedures should be in place to determine if the existing risk assessment remains valid, suitable and sufficient. If it is not, then a reassessment of the risk is required.

Water Treatment Services

- Have a Legionella risk assessment, written scheme of control and schematic diagrams in place, which includes a programme of treatment, monitoring and inspection and to make them available to Envirocure.
- Provide sufficient information to enable Envirocure to design an appropriate treatment programme - it is not adequate to request the provision of water treatment services "in accordance with L8".
- Make systems available and ensure safe access for treatment, monitoring and inspection.
- Ensure that tasks they are responsible for are completed and documented in the agreed record system.
- Participate in the agreed review process.
- Provide notification and any necessary instruction on known risks and safety requirements in the areas Envirocure will be working e.g., access to the site asbestos register.

Hot and Cold Water Monitoring and Inspection Services

- Have a risk assessment and written scheme of control in place, which includes a programme of monitoring and inspection and to make this available to the service provider.
- Make systems available for monitoring and inspection to enable the service provider to plan and execute the service.
- Ensure safe access for monitoring and inspection is provided.
- Ensure that tasks allocated to them are completed.
- Adhere to the agreement regarding definition of scope and any responsibility implied.

Cleaning and Disinfection Services

- Maintain the entire system, and the water in it, in a clean condition and to facilitate inspection to determine if the system is clean or not.
- Make systems available for cleaning and disinfection if required with adequate notice to enable Envirocure to plan and execute the service.
- Ensure safe access for inspection and cleaning is provided.
- Adhere to the agreement regarding definition of scope and any responsibility implied.
- Ensure any necessary discharge consent is in place for effluent generated during the clean and disinfection process.

Independent Consultancy Services

- Provide the consultant with access to any pertinent historic information relevant to the project.
- Clearly define the scope of the work, its objectives and outcomes when engaging an independent consultant for any project concerned with Legionella risk control services.
- Agree the expectations with the consultant prior to commencement, referencing the agreed level of detail in, and format of the reporting; for example, schematic diagrams, asset registers, photographs, reports, etc.

Training Services

- Assess the training needs and requirements of their own staff (possibly in conjunction with Envirocure)
- Complete regular reviews of own staff training records (possibly in conjunction with Envirocure)
- Complete regular competence assessments for specific tasks and identify further training requirements and format, e.g., theory, practical, etc.
- Determine if the content of any training offered meets the requirements.

Legionella Sampling and Testing Services

- Have a risk assessment and written scheme of control in place, which may include a Legionella sampling programme and to make this available to Envirocure.
- Provide sufficient information to enable Envirocure to design an appropriate sample plan.
- Make systems available and ensure safe access for sampling.
- Participate in the review process.
- Provide notification and any necessary instruction on known risks and safety requirements in the areas Envirocure will be working e.g., access to your asbestos register.

Plant and Equipment Services

- Consider that changes to the water system may alter the Legionella risk such that a reassessment of risk is required.
- Ensure that any equipment as described above is designed, installed and commissioned correctly.
- Make the appropriate notification under the requirements of the Plumbing Notification Laws.
- Apply for a trade effluent discharge consent where appropriate.
- Update the written scheme of control, if required.

Definitions of Key Personnel

Information about key personnel with regards to the management of Legionella is detailed below. This data has been extracted from the Water Management Society's document 'Guide to Legionella Risk Assessment, Issue 5 09-2019' section 2.4.3.

Identification of Key Personnel

A list of key personnel, with contact details, should be on site and might be included in the report. All appointments should be made in writing. The risk assessment shall note whether the list is present, correct, complete and up to date. If it is not, it should be identified either as an anomaly and if appropriate as a risk factor.

Those included should be:

The Duty Holder

Described in L8 (the Approved Code of Practice, 4th edition 2013) as the employer, the self-employed person or the person in control of the premises. In most cases it is unlikely that there will be more than one duty holder, but in cases of shared accommodation, there may well be a shared responsibility. The duty holder cannot delegate their duty, but they can delegate managerial responsibility to the Responsible Person (sometime referred to as the appointed competent person).

The Responsible Person

L8 states that the responsible person (or persons) should have sufficient authority, competence, and knowledge of the installation to ensure all operations are carried out in a timely and effective manner. The Responsible Person is therefore going to take managerial responsibility for the system and it is likely that they will have been instrumental in requiring the risk assessment to be carried out (or indeed could carry out the risk assessment themselves, if competent). It is the duty of the Responsible Person to make reasonable enquiries to ensure that organisations such as risk assessors, water treatment companies or consultants, together with persons from the occupier's organisation are competent, suitably trained and equipped.

As part of their duties, the Responsible Person shall ensure the day-to-day running of the system is maintained and that the necessary checks, tests, remedial work and audits are carried out. The Responsible Person may not necessarily be carrying out any of this work but may have managerial input e.g. the Responsible Person would be expected to take an active role in review meetings and audits.

The Deputy Responsible Person

A person appointed to take over the duties of the Responsible Person in their absence (illness, holidays etc.). This person needs to be fully aware of the requirements and duties of the Responsible Person. They do not necessarily work for the Responsible Person and indeed they may be the Duty Holder. Note: It is reasonable to expect that the responsible persons and their deputies are appointed, and accept those responsibilities, in writing. Other Key Persons - These include the people appointed to implement the strategies and day-to-day control of the systems. They should be informed, instructed, trained and their suitability assessed. They shall be properly trained to a level that ensures tasks are carried out in a safe, technically competent manner and receive regular refresher training. Operators of process water systems, maintenance personnel and any deputies of these people need to be given sufficient information to ensure they understand the potential impact of their actions. Key personnel who need to be recorded (with contact details) but are not employed by the site directly may include the risk assessor, mechanical and electrical sub-contractors (if used) facilities managers and water treatment consultants. All individuals with responsibilities, tasks or duties shall be named and have designated named deputies. These also should be informed, instructed, trained and their suitability assessed.

Legionella Bacteria Overview

Legionellaceae are common environmental bacteria found in most natural water resources, including lakes and rivers. They can also survive water treatment processes in small numbers and can be supplied within mains water. Should these bacteria then enter any water service where they can multiply, and where a means of creating and transmitting water droplets is present, people using or in the vicinity of these services may be at risk.

Infections caused by *Legionella pneumophila* bacteria or other organisms within the family Legionellaceae are termed Legionellosis. Legionnaires' disease is the worst of these and causes a pneumonia which can be fatal. Those most at risk are the very old and very young, the immunosuppressed and smokers etc.

Legionella bacteria can also cause other, less harmful illnesses such as Pontiac fever and Lochgoilhead fever, which can affect all people.

Infection is caused by inhaling airborne water droplets that contain Legionella and are small enough to pass deep into the lung. Currently this is the only mode of infection and there is no evidence that the disease is transmitted by ingestion of contaminated water, or indeed from person to person.

Most individual cases or outbreaks of disease have been attributed to hot and cold water services within buildings, evaporative cooling towers and whirlpool spas, etc.

A number of factors are required to create a risk of Legionellosis:-

- The presence of Legionella bacteria
- Conditions suitable for the proliferation of those bacteria
- A means of creating and disseminating an aerosol
- The presence of individuals who may be exposed

The conditions favouring the proliferation of Legionella are: -

- Moisture
- Temperature between 20°C and 50°C
- Availability of nutrients, for example, from sediment, sludge, organic material, scale, rust, compatible organisms and materials used in construction of water systems
- Presence of biofilm (bacterial slime) on surfaces in contact with water

The elimination of as many of these conditions as possible forms the basis of control of the risk. Treatment regimes to eradicate or reduce the proliferation of Legionella (based on physical or chemical disinfection of water systems) also help to control the risk but do not prevent it.

Under the ACoP, a suitable and sufficient assessment is required to identify and assess the risk of exposure to Legionella bacteria from work activities and water systems on the premises and any necessary precautionary measures.

The assessment is carried out by or on behalf of: -

- The employer, where the risk from their undertaking is to their employees or to others or;
- A self-employed person, where there is a risk from their undertaking to themselves or to others or;
- The person who is in control of the premises or systems in connection with the work where the risk is present from systems in the building (e.g., Tenants where the building is let, however the landlord retains responsibility for its maintenance).

The assessment needs to be reviewed regularly and, in any case, whenever there is reason to believe that the original assessment may no longer be valid.

Important Information

General

This assessment is based on information known to Envirocure Limited on the date of survey. Envirocure Limited accepts no responsibility for any loss or claim arising from information contained within this or any other associated document.

Envirocure Limited reserve the right to allow our client fourteen days in which to notify Envirocure Limited of any inaccuracies or changes contained within this documentation, after which it will be assumed that our client has accepted the documentation to be satisfactory and fully complete.

Envirocure Limited rights reserved. No part of the format and content of this documentation may be reproduced, stored in a retrieval system or transmitted, in any form or by any means, electronic, mechanical, photocopying, recording or otherwise, without the prior written permission of Envirocure Limited.

Periodic Review

Risk assessments should be reviewed when: -

- Significant changes have been made to a system, e.g., remedial works or planned modifications have been implemented.
- Changes have been made to the management and/or maintenance of the system, e.g., 6 months after a new maintenance company has been appointed.
- Significant changes have occurred in the way a system is being used, e.g., a formerly fully occupied building is now only partially occupied. If there is a doubt about what circumstances should initiate a review of the risk assessment, particularly at a complex or developing site, then a programme of annual reviews of audits should be considered.
- The review date as set by the assessor has been reached.

It is the responsibility of the duty holder to ensure risk assessment documents are reviewed or reassessed as soon as there is any reason to question its validity.

Competence

Envirocure confirm that all assessors are trained and competent to undertake the task. Training competency records can be made available on request.

Record Keeping

Records for all Legionella control activities should be kept for a period of 5 years, ideally in a central location. You have overall responsibility for maintaining these records.

Hot and Cold System Risk Summary

In direct relation to the risk rating matrix, the hot and cold systems addressed in this assessment are listed below.

System Reference	Key Assets	System Risk Rating
Mains	N/A	Medium
DHWS 1	Mains / POUH 1	Medium

Hot and Cold Water System Risk Potential

System: Mains

Water Source Contamination

Risk Total	Column A		
10	Source Water	Risk	Total
	Chemically Treated	1	10
	Mains Clean	10	
	Stored Town Mains <24 Hours	15	
	Stored Town Mains >24 Hours	20	
	Reclaimed/Grey Water/Borehole	50	

Asset Amplification: $A + (TOTAL B) \times C$

Risk Total	Column A			Column B			Column C		
3	Temperature	Risk	Total	Food Source Present	Risk	Total	Turnover (Hours)	Risk	Total
	<20°C	1	1	Iron Rust	5	0	Not Applicable/Emergency Use Only	0	3
	20-25°C	5		Scale/Debris	5		<12	1	
	26-45°C	10		Biofilm	5		<24	3	
	46-50°C	5		Deadleg	5		<48	6	
	>50°C	1		Not Applicable	0		>48	10	

Transmission and Exposure: $A \times B$

Risk Total	Column A			Column B		
50	Droplet Formation	Risk	Total	System Aerosol	Risk	Total
	Still Water/No Droplets	1	5	Confined to Single Area/Dwelling	1	10
	Coarse Droplets	5		Within Multiple Areas/Dwellings	10	
	Aerosol, Fine Mist	20		Open to External Atmosphere	20	

Host Susceptibility within the Exposure Area

Risk Total	Column A		
50	Types of Person	Risk	Total
	No exposure under normal use	0	50
	Age <20 with no immunosuppression	10	
	Age <50 with no immunosuppression	25	
	Immunosuppressed, or over 50/unknown	50	

Potential Risk Total – 113 Medium

Matrix	Risk
<100	Low
101-300	Medium
301-500	High
500+	Very High

Site: HORSEMONDEN PUBLIC CONVENIENCES

Date: 18/08/2026

Job No.: K14796-01

Head Office: Unit 50-51 Riverside Estate, Sir Thomas Langley Road, Medway City Estate, Rochester, ME2 4DP

Scotland Office: Suite 51 Grovewood Business Centre, Strathclyde Business Park, Bellshill, Lanarkshire, ML4 3NQ

Kent: 01634 726716 | Scotland: 01698 844843 | admin@envirocure.co.uk | sales@envirocure.co.uk

Hot and Cold Water System Risk Potential

System: DHWS 1

Water Source Contamination

Risk Total	Column A		
10	Source Water	Risk	Total
	Chemically Treated	1	10
	Mains Clean	10	
	Stored Town Mains <24 Hours	15	
	Stored Town Mains >24 Hours	20	
	Reclaimed/Grey Water/Borehole	50	

Asset Amplification: A + (TOTAL B) x C

Risk Total	Column A			Column B			Column C		
3	Temperature	Risk	Total	Food Source Present	Risk	Total	Turnover (Hours)	Risk	Total
	<20°C	1	1	Iron Rust	5	0	Not Applicable/Emergency Use Only	0	3
	20-25°C	5		Scale/Debris	5		<12	1	
	26-45°C	10		Biofilm	5		<24	3	
	46-50°C	5		Deadleg	5		<48	6	
	>50°C	1		Not Applicable	0		>48	10	

Transmission and Exposure: A x B

Risk Total	Column A			Column B		
50	Droplet Formation	Risk	Total	System Aerosol	Risk	Total
	Still Water/No Droplets	1	5	Confined to Single Area/Dwelling	1	10
	Coarse Droplets	5		Within Multiple Areas/Dwellings	10	
	Aerosol, Fine Mist	20		Open to External Atmosphere	20	

Host Susceptibility within the Exposure Area

Risk Total	Column A		
50	Types of Person	Risk	Total
	No exposure under normal use	0	50
	Age <20 with no immunosuppression	10	
	Age <50 with no immunosuppression	25	
	Immunosuppressed, or over 50/unknown	50	

Potential Risk Total – 113 Medium

Matrix	Risk
<100	Low
101-300	Medium
301-500	High
500+	Very High

Site: HORSEMONDEN PUBLIC CONVENIENCES

Date: 18/08/2026

Job No.: K14796-01

Head Office: Unit 50-51 Riverside Estate, Sir Thomas Langley Road, Medway City Estate, Rochester, ME2 4DP

Scotland Office: Suite 51 Grovewood Business Centre, Strathclyde Business Park, Bellshill, Lanarkshire, ML4 3NQ

Kent: 01634 726716 | Scotland: 01698 844843 | admin@envirocure.co.uk | sales@envirocure.co.uk

Hot and Cold Water Systems Asset Condition Reports

The following section contains the condition reports for all identified hot and cold water plant within the buildings.

This typically includes: -

- Cold Water Storage Tanks
- Calorifier / Hot Water Cylinders
- Heat Exchangers
- Low Storage Point of Use Heaters
- Combination Water Heater
- Non Storage / Instantaneous Heaters

Each asset will be given a risk rating based on the matrix below.

		As Found Temperature (°C)				
		<20	20-25	26-45	46-50	>50
Level of Identified Food Sources	None / Light	1	5	10	5	1
	Moderate	5	25	50	25	5
	Heavy	10	50	100	50	10

Score	Risk Potential
<5	Low
10-25	Medium
>50	High

Low Storage Point of Use Heaters

HSG 274 part 2 classifies these units as low storage volume point of use water heaters. These units are those that store no more than 15 litres of hot water.

LV POUH Reference	POUH 1					
Asset Risk Potential	Low					
Location	Cleaners					
Safe Access to the Unit	Yes					
Type	Pressurised					
Supplied from	Mains					
Supplying Systems	DHWS 1					
Make/Age	Hyco / >3 Years					
Approximate Volume (Litres)	10					
Orientation	Vertical					
Method of Heating	Electric					
Circulation Pump Fitted/Ref.	No					
Insulated	Yes					
Pressure Vessel Fitted/Orientation/ Flushing Point Fitted	Yes / Vertical / Yes					
Estimated Turnover	<24 Hours					
Temperature/Isolation Fitted	Temperature (°C)		Isolation Fitted			
	As Found	Target				
Supply	19.5	N/A	No			
Flow	58.1	50-60	Yes			
Return	N/A	N/A	N/A			
External Photograph						
Comments						

Expansion Vessel and Hydraulic Accumulators

Vessel Reference	EXP 1	
Asset Risk Potential	Low	
Location	Cleaners	
Unit Type	Pressurised System Expansion	
Associated System	Mains	
Distance from Main Run	<1 Metre	
Orientation	Vertical	
Drain Valve Fitted	Yes	
Localised Isolation Valve Fitted	Yes	
Is the unit a flow through design	No	
Water Temperature (°C)	19.7	
Photograph		

Hot and Cold Water System Surveys

The following section contains the hot and cold water system surveys and outlets including points of atomisation.

General Hot and Cold Water Outlets

General	Location	Disabled WC	Male WC	Cleaners	Female WC
	Frequency of Use	Daily	Daily	Daily	Daily
Mains	Mains	Yes	Yes	Yes	Yes
	No. of Outlets	1	1	1	1
	Mains Water Temperature (°C)	19.6	19.5	19.7	19.6
Domestic Cold Water	Cold Water	No	No	No	No
	System Ref.	N/A	N/A	N/A	N/A
	No. of Outlets	N/A	N/A	N/A	N/A
	Monitoring Location	N/A	N/A	N/A	N/A
	Monitoring Type	N/A	N/A	N/A	N/A
	Type of Outlet	N/A	N/A	N/A	N/A
	Condition of Outlet	N/A	N/A	N/A	N/A
	Possibility of Spray Formation	N/A	N/A	N/A	N/A
	Domestic Cold Water Temperature (°C)	N/A	N/A	N/A	N/A
	Cold Water Target Temperature (°C)	N/A	N/A	N/A	N/A
	Hot Water	Yes	Yes	No	Yes
Domestic Hot Water	System Ref.	DHWS 1	DHWS 1	N/A	DHWS 1
	No. of Outlets	1	1	N/A	1
	Monitoring Location	No	Yes	N/A	No
	Monitoring Type	N/A	Nearest	N/A	N/A
	Type of Outlet	Hot Tap	Hot Tap	N/A	Hot Tap
	Condition of Outlet	Good	Good	N/A	Good
	Possibility of Spray Formation	Low	Low	N/A	Low
	Domestic Hot Water Temperature (°C)	58.0	58.2	N/A	N/A
	Hot Water Target Temperature (°C)	>50	>50	N/A	N/A
	Number of TMV Fitted/ Representative Temperature (°C)	1 TMT 41.7	1 TMV 41.1	N/A	TMV in Cleaners 40.9
	Maximum run of Blended Water (Metres)	<2 Metres	<2 Metres	N/A	<2 Metres
	Sink				
Assets	Wash Hand Basin	1	1		1
	Bath				
	Toilet	1	1		2
	Shower				
	Urinal		1		
	Bidet				
	Other			BT	
	Flexi Hoses				
	Deadleg				

Site: HORSEMONDEN PUBLIC CONVINIENCES

Date: 18/08/2026

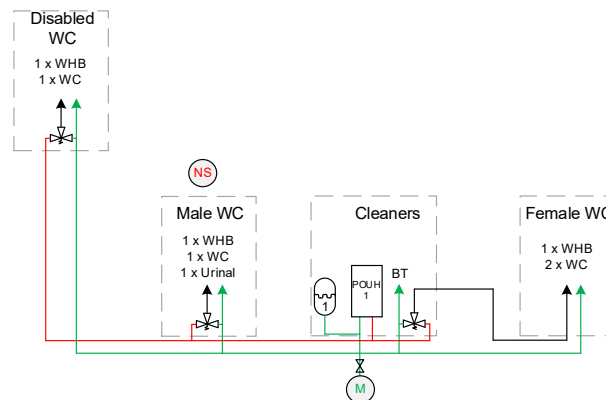
Job No.: K14796-01

Head Office: Unit 50-51 Riverside Estate, Sir Thomas Langley Road, Medway City Estate, Rochester, ME2 4DP

Scotland Office: Suite 51 Grovewood Business Centre, Strathclyde Business Park, Bellshill, Lanarkshire, ML4 3NQ

Kent: 01634 726716 | Scotland: 01698 844843 | admin@envirocure.co.uk | sales@envirocure.co.uk

Hot and Cold Water System Schematic



Key

— Cold Water (Mains)	NS Nearest Hot Sentinel Location	Non Return Valve (NRV)	Combination Water Heater	Pressurisation Unit	Mixer Shower
— Cold Water Down Service from Tank	FS Furthest Hot Sentinel Location	Double Check Valve	Buffer Vessel	Expansion Vessel	TMV Shower
— Hot Water	RL Principal Return Loop Location	Tundish	Point of Use Water Heater	Plate Heat Exchanger	No Access at Time of Assessment
— Hot Water Return	SL Subordinate Return Loop Location	Open Vent	Instantaneous Water Heater / Combi Boiler	Instantaneous Shower	
— TMV (Blended) Water	Riser	Drain Valve	Cold Water Storage Tank	BT	CM
— Grey Water/Rain Water Reclaim	Low Use Area/Deadleg Location	FE	POUH	DW	DWF
— Softened Water	Stop End	Calorifier	INST	DWT	IM
M Incoming Main Location	Thermostatic Mixer Valve (TMV)			MFWC	PW
B Borehole Location	Pump			SO	WB
NS Nearest Cold Sentinel Location	Strainer			WC	WHB
FS Furthest Cold Sentinel Location	Isolation Valve			WM	Bib Tap

HORSMONDEN PARISH COUNCIL
Public Conveniences
Maidstone Road
Horsmonden
Kent
TN12 8JS

Job No. – K14796-01
Produced Date – 18th August 2026
Drawing No. – D1
Revision No. – R0

ENV/SCH L8-4 V4

Pipework layouts are based on the best available information on site. Where pipework is found to run through walls and floors the assessor has used experience and good judgement to produce this drawing. Where alterations are found, this layout should be updated as needed. Where there have been areas of no access or uncertainty exists, this is clearly marked on the schematic drawing. Historic records may be used to provide information to compose this drawing as appropriate.

Site: HORSEMONDEN PUBLIC CONVENIENCES

Date: 18/08/2026

Job No.: K14796-01

Head Office: Unit 50-51 Riverside Estate, Sir Thomas Langley Road, Medway City Estate, Rochester, ME2 4DP

Scotland Office: Suite 51 Grovewood Business Centre, Strathclyde Business Park, Bellshill, Lanarkshire, ML4 3NQ

Kent: 01634 726716 | Scotland: 01698 844843 | admin@envirocure.co.uk | sales@envirocure.co.uk

Sampling Plans and Procedures

Question	Answer	Comments
Is there an existing sampling plan in place?	No	
Is the existing sampling plan put together as part of a written scheme of control based on ACoP L8 and HSG 274?	N/A	
Is the existing sampling plan put together by the client as confirmation of control under their own policies?	N/A	
Is the existing sampling plan put together based on other regulations and guidance?	N/A	
Is sampling carried out by a competent person / contractor?	N/A	
Is sampling carried out to approved and fit for purpose methods of work / procedures?	N/A	
Is sample analysis carried out by UKAS accredited laboratories?	N/A	
Are sufficient records of sample taking and analysis results being kept?	N/A	
Is there evidence of current / ongoing non-conformances (such as Legionella positive results, high TVC results etc.)?	N/A	
Is there evidence of old / resolved non-conformances (such as Legionella positive results, high TVC results etc.)?	N/A	
Are sufficient action plans in place to deal with issues of non-conformance?	N/A	
Are poor results reviewed and remedial actions undertaken?	N/A	
Are results escalated where there is no evidence of action being undertaken within the guidance time?	N/A	
Are existing sampling plans sufficient for purpose?	N/A	
Additional Comments		
N/A		

Site: HORSEMONDEN PUBLIC CONVENIENCES

Date: 18/08/2026

Job No.: K14796-01

Head Office: Unit 50-51 Riverside Estate, Sir Thomas Langley Road, Medway City Estate, Rochester, ME2 4DP

Scotland Office: Suite 51 Grovewood Business Centre, Strathclyde Business Park, Bellshill, Lanarkshire, ML4 3NQ

Kent: 01634 726716 | **Scotland:** 01698 844843 | admin@envirocure.co.uk | sales@envirocure.co.uk

Recommended Sampling Plan

Planned sampling of water systems can play an important role in monitoring the condition of the water on a site.

The following recommended sampling plan has been produced based on the findings of the assessment. The recommended sampling plan should be reviewed and implemented by the duty holder as needed. Details of recommended sample point locations are included on the schematic diagram.

Recommended Sample Point Ref.	Location	Outlet	To Assess System or Outlet Condition	Water System Type	Fed from which Asset / System	Pre or Post Outlet Disinfection	Pre or Post Outlet Flush	Pre or Post System Disinfection	Sample Type	Frequency of Sampling	Sampling Currently in Place or Recommended	Sample Required based on Assessment	Notes
	N/A												

Key

C – Included on Current Sampling Plan | R – Added as Part of Recommended Sampling Plan | Yes – Consider Removal from Sampling Plan | No – Include in Sampling Plan

Notes
N/A

Site: HORSEMONDEN PUBLIC CONVENIENCES

Date: 18/08/2026

Job No.: K14796-01

Head Office: Unit 50-51 Riverside Estate, Sir Thomas Langley Road, Medway City Estate, Rochester, ME2 4DP

Scotland Office: Suite 51 Grovewood Business Centre, Strathclyde Business Park, Bellshill, Lanarkshire, ML4 3NQ

Kent: 01634 726716 | **Scotland:** 01698 844843 | admin@envirocure.co.uk | sales@envirocure.co.uk

Management Control

The Health and Safety Executive (HSE) highlights that poor management control and lack of record keeping can be major factors contributing to the inadequate control of Legionella bacteria. At all times there should be a documented responsible person and a suitable communication pathway listed. All personnel involved with Legionella management should be suitably trained.

Management Team

Statutory Duty Holder	
Name	Matt Richards
Job Title	Chair Person For Parish Council
Company	Horsmonden Village Hall
Address	Horsmonden Village Hall, Back Lane, Horsmonden, Kent, TN12 8LH
Telephone Number – Landline	01892 724989
Telephone Number – Mobile	07484 904765
Email Address	Chair@horsmonden-pc.gov.uk
Summary of Qualifications and Experience	Legionella Awareness
Summary of Duties	Chair Person For Parish Council
Competent to carry out Legionella control tasks	Yes

Appointed Responsible Person	
Name	Mrs Lucy Noakes
Job Title	Clerk to Horsmonden Parish Council (landlords)
Company	Horsmonden Parish Council
Address	The Parish Office, Horsmonden Village Hall, Horsmonden, Kent
Telephone Number – Landline	01892 724989
Telephone Number – Mobile	07484904765
Email Address	clerk@horsmonden-pc.gov.uk
Summary of Qualifications and Experience	Legionella Awareness
Summary of Duties	Clerk to Horsmonden Parish Council (landlords)
Competent to carry out Legionella control tasks	Yes

Deputy Appointed Responsible Person	
Name	Anna Blyth
Job Title	Assistant Clerk Horsmonden Parish Council
Company	Horsmonden Parish Council
Address	The Parish Office, Horsmonden Village Hall, Horsmonden, Kent
Telephone Number – Landline	01892 724989
Telephone Number – Mobile	07946 136185
Email Address	Assistantclerk@horsmonden-pc.gov.uk
Summary of Qualifications and Experience	Legionella Awareness
Summary of Duties	Assistant Clerk Horsmonden Parish Council
Competent to carry out Legionella control tasks	Yes

Contact information for the current Legionella consultancy service

Legionella Consultancy Service	
Name	Gavin Smith
Job Title	Consultant
Company	Envirocure Ltd
Address	Unit 50-51 Riverside Estate, Sir Thomas Langley Road, Medway City Estate, Rochester, ME2 4DP
Telephone Number – Landline	01634 726 716
Telephone Number – Mobile	N/A
Email Address	admin@envirocure.co.uk
Competent to carry out Legionella control tasks	Yes

Contact information for known relevant maintenance organisations

Maintenance Organisations	
Name	N/A
Job Title	N/A
Company	N/A
Address	N/A
Telephone Number – Landline	N/A
Telephone Number – Mobile	N/A
Email Address	N/A
Competent to carry out Legionella control tasks	N/A

As detailed in HTM04-01 additional management teams and procedures should be put in place to manage safe water within healthcare premises. This includes the introduction of a Water Safety Group (WSG) and Water Safety Plan (WSP). Collation of this information falls outside the scope of this assessment. The duty holder should ensure the requirements of HTM04-01 are met.

Documentation

Review of systems identified on site are detailed on the table below: -

Category	Question	Answer	Comments
Legionella Policy	Is there evidence of a Legionella policy?	Yes	
	Does the policy contain a statement of intent and clarification of external guidance such as ACoP L8 (HSG274) which are to be used by the management team in conjunction with the policy?	Yes	
	Does the policy set the roles and responsibilities of the management team by name / role in the organisation? (To include the Water Safety Group (WSG) if Healthcare)	Yes	
	Is there effective liaison between the duty holder and the responsible person? (To include the Water Safety Group (WSG) if Healthcare)	Yes	
	Are there suitable training records for the management team?	Yes	
	Does the policy set responsibilities for other individuals such as tenants, contractors or visitors whilst working / living within the building?	Yes	
	Are timescales set for renewal of Risk Assessments and other activities that set precedence over the recommendations and actions within this assessment?	No	
	Does the policy set control systems and responsibilities for managing residual risks that cannot be removed to a level as low as reasonably practical? (See HSG274 checklist 2.4)?	Yes	
	Does the policy set mechanisms and timescales for dealing with hazards identified in the Legionella Risk Assessment, or subsequent control systems by priority?	Yes	
	Does the policy set out pre agreed actions for foreseeable risks, such as the loss of management system control, Legionella bacterial detection at elevated levels, or a Legionella incident?	Yes	
	Does the policy set the criteria and vetting for the use of contractors and third-party consultants to assist with Legionella control as required? (Such as use of approved companies vetted by Legionella Control Association)	Yes	
	Is the policy in date?	Yes	September 2023
	Is there a date for the policy to be reviewed?	Yes	September 2024
	Where there is a foreseeable period of building(s) / equipment being out of service (e.g. seasonal use of buildings, equipment on standby etc.), is there a suitable return to service plan that incorporates the management of Legionella?	Yes	
	Is the policy suitable for purpose?	Yes	
Legionella Risk Assessment, Asset Register and Schematic Diagrams	Is the previous Risk Assessment available?	Yes	
	Who produced the previous Risk Assessment?	Envirocure	
	Has the review date for the previous Risk Assessment lapsed?	No	18 th September 2026
	Does the previous assessment contain the relevant information to meet LCA standards including asset registers and schematic diagrams?	Yes	
	Is the previous asset register available (if not included in the previous Risk Assessment)?	N/A	
	Are the existing schematic diagrams available (if not included in the previous Risk Assessment)?	N/A	
	Have there been significant changes to the systems on site and or management of the site since the previous Risk Assessment, asset register and schematic diagram was produced?	No	

Site: HORSEMONDEN PUBLIC CONVENIENCES

Date: 18/08/2026

Job No.: K14796-01

Head Office: Unit 50-51 Riverside Estate, Sir Thomas Langley Road, Medway City Estate, Rochester, ME2 4DP

Scotland Office: Suite 51 Grovewood Business Centre, Strathclyde Business Park, Bellshill, Lanarkshire, ML4 3NQ

Kent: 01634 726716 | **Scotland:** 01698 844843 | admin@envirocure.co.uk | sales@envirocure.co.uk

Category	Question	Answer	Comments
Written Scheme of Control / Log Book	Is there a written scheme of control in place?	Yes	
	Does the scheme of control address the actual risks identified in previous risk assessments?	Yes	
	Does the scheme of control assess the incident plan?	Yes	
	Does the scheme of control detail any plant or equipment brought on to site by third parties?	Yes	
	Does the scheme of control include the following:		
	• Purpose and scope of the written scheme of control	Yes	
	• The responsibility for tasks to be undertaken by each individual or party are outlined clearly with the necessary frequency of the tasks	Yes	
	• An assessment of task method statements	Yes	
	• Checking the start-up and shut down procedures, plant rotation and flushing for little used outlets	Yes	
	• Lines of communication and the reporting structure are clearly stated in the written scheme of control	Yes	
	• Reference to identified risks	Yes	
	• Notification of any cooling towers or evaporative condensers	N/A	
	• Management structure		
	o <i>Duty holder</i>	Yes	
	o <i>Responsible person(s) and communication pathways</i>	Yes	
	o <i>Training records of personnel involved in the scheme of control</i>	Yes	
	o <i>Allocation of all responsibilities i.e. to the duty holder, responsible person(s), site staff and third parties such as water treatment providers and other subcontractors</i>	Yes	
	o <i>Schematic diagram</i>	Yes	
Non Conformances	Are all written scheme of control findings stored in a central location / log book or multiple areas?	Yes	
	Are maintenance records available for water systems and plant?	Yes	
	Are the control measures effective?	Yes	
	Is the written scheme of control suitable for purpose?	Yes	
	Is there evidence of historic data up to 5 years before the current year?	Yes	
Non Conformances	Do monitoring, inspection and sampling records for the systems show significant deviations from acceptable operating conditions?	No	
	Is there evidence of an active review process of risk assessment and written scheme of control recommendations?	Yes	
	Is there evidence of an escalation process for recommendations not addressed within the guidance time?	Yes	

Site: HORSEMONDEN PUBLIC CONVENIENCES

Date: 18/08/2026

Job No.: K14796-01

Head Office: Unit 50-51 Riverside Estate, Sir Thomas Langley Road, Medway City Estate, Rochester, ME2 4DP

Scotland Office: Suite 51 Grovewood Business Centre, Strathclyde Business Park, Bellshill, Lanarkshire, ML4 3NQ

Kent: 01634 726716 | Scotland: 01698 844843 | admin@envirocure.co.uk | sales@envirocure.co.uk

Additional Comments
N/A

Written Scheme Management Systems and Records

The following section compares the checklist tasks from ACoP L8 against site assets, confirming who is allocated to the task and what records are being kept to ensure they are being undertaken at regular intervals.

Hot and Cold System Written Scheme of Control

Table 2.1 - Checklist for hot and cold water systems.

ACoP L8 Table 2.1			Assessor	Written Scheme of Control Checklist for Tasks In Place			
Service	Action to take	Frequency	Recommended Frequency	Relevant	Frequency	Assigned to	Evidence Available to Verify
Calorifiers	Inspect calorifier internally by removing the inspection hatch or using a borescope and clean by draining the vessel. The frequency of inspection and cleaning should be subject to the findings and increased or decreased based on conditions recorded	Annually, or as indicated by the rate of fouling	N/A	No	N/A	N/A	N/A
	Where there is no inspection hatch, purge any debris in the base of the calorifier to a suitable drain Collect the initial sample from the base of hot water heaters to inspect clarity, quantity of debris, and temperature	Annually, but may be increased as indicated by the risk assessment or result of inspection findings	N/A	No	N/A	N/A	N/A
	Check calorifier flow temperatures (thermostat settings should modulate as close to 60°C as practicable without going below 60°C) Check calorifier return temperatures (not below 50°C, in healthcare premises not below 55°C)	Monthly	N/A	No	N/A	N/A	N/A
Hot water services	For non-circulating systems: take temperatures at sentinel points (nearest outlet, furthest outlet and long branches to outlets) to confirm they are at a minimum of 50°C within one minute (55°C in healthcare premises)	Monthly	N/A	No	N/A	N/A	N/A
	For circulating systems: take temperatures at return legs of principal loops (sentinel points) to confirm they are at a minimum of 50°C (55°C in healthcare premises). Temperature measurements may be taken on the surface of metallic pipework	Monthly	N/A	No	N/A	N/A	N/A
	For circulating systems: take temperatures at return legs of subordinate loops, temperature measurements can be taken on the surface of pipes, but where this is not practicable, the temperature of water from the last outlet on each loop may be measured and this should be greater than 50°C within one minute of running (55°C in healthcare premises). If the temperature rise is slow, it should be confirmed that the outlet is on a long leg and not that the flow and return has failed in that local area	Quarterly (ideally on a rolling monthly rota)	N/A	No	N/A	N/A	N/A
	All HWS systems: take temperatures at a representative selection of other points (intermediate outlets of single pipe systems and tertiary loops in circulating systems) to confirm they are at a minimum of 50°C (55°C in healthcare premises) to create a temperature profile of the whole system over a defined time period	Representative selection of other sentinel outlets considered on a rotational basis to ensure the whole system is reaching satisfactory temperatures for Legionella control	N/A	No	N/A	N/A	N/A
POU water heaters (no greater than 15 litres)	Check water temperatures to confirm the heater operates at 50–60°C (55°C in healthcare premises) or check the installation has a high turnover	Monthly–six monthly, or as indicated by the risk assessment	Quarterly	Yes	Quarterly	Envirocure	Yes
Combination water heaters	Inspect the integral cold water header tanks as part of the cold water storage tank inspection regime, clean and disinfect as necessary. If evidence shows that the unit regularly overflows hot water into the integral cold water header tank, instigate a temperature monitoring regime to determine the frequency and take precautionary measures as determined by the findings of this monitoring regime	Annually	N/A	No	N/A	N/A	N/A
	Check water temperatures at an outlet to confirm the heater operates at 55–60°C	Monthly	N/A	No	N/A	N/A	N/A
Cold water tanks	Inspect cold water storage tanks and carry out remedial work where necessary	Annually	N/A	No	N/A	N/A	N/A
	Check the tank water temperature remote from the ball valve and the incoming mains temperature. Record the maximum temperatures of the stored and supply water recorded by fixed maximum/minimum thermometers where fitted	Annually (Summer) or as indicated by the temperature profiling	N/A	No	N/A	N/A	N/A

Site: HORSEMONDEN PUBLIC CONVINIENCES

Date: 18/08/2026

Job No.: K14796-01

Head Office: Unit 50-51 Riverside Estate, Sir Thomas Langley Road, Medway City Estate, Rochester, ME2 4DP

Scotland Office: Suite 51 Grovewood Business Centre, Strathclyde Business Park, Bellshill, Lanarkshire, ML4 3NQ

Kent: 01634 726716 | Scotland: 01698 844843 | admin@envirocure.co.uk | sales@envirocure.co.uk

ACoP L8 Table 2.1			Assessor	Written Scheme of Control Checklist for Tasks In Place			
Service	Action to take	Frequency	Recommended Frequency	Relevant	Frequency	Assigned to	Evidence Available to Verify
Cold water services	Check temperatures at sentinel taps (typically those nearest to and furthest from the cold tank, but may also include other key locations on long branches to zones or floor levels). These outlets should be below 20°C within two minutes of running the cold tap. To identify any local heat gain, which might not be apparent after one minute, observe the thermometer reading during flushing	Monthly	N/A	No	N/A	N/A	N/A
	Take temperatures at a representative selection of other points to confirm they are below 20°C to create a temperature profile of the whole system over a defined time period. Peak temperatures or any temperatures that are slow to fall should be an indicator of a localised problem	Representative selection of other sentinel outlets considered on a rotational basis to ensure the whole system is reaching satisfactory temperatures for Legionella control	N/A	No	N/A	N/A	N/A
	Check thermal insulation to ensure it is intact and consider weatherproofing where components are exposed to the outdoor environment	Annually	N/A	No	N/A	N/A	N/A
Showers and spray taps	Dismantle, clean and descale removable parts, heads, inserts and hoses where fitted	Quarterly or as indicated by the rate of fouling or other risk factors, e.g. areas with high risk patients	N/A	No	N/A	N/A	N/A
POU filters	Record the service start date and lifespan or end date and replace filters as recommended by the manufacturer (0.2µm membrane POU filters should be used primarily as a temporary control measure while a permanent safe engineering solution is developed, although long-term use of such filters may be needed in some healthcare situations)	According to manufacturer's guidelines	N/A	No	N/A	N/A	N/A
Base exchange softeners	Visually check the salt levels and top up salt, if required. Undertake a hardness check to confirm operation of the softener	Weekly, but depends on the size of the vessel and the rate of salt consumption	N/A	No	N/A	N/A	N/A
	Service and disinfect	Annually, or according to manufacturer's guidelines	N/A	No	N/A	N/A	N/A
Multiple use filters	Backwash and regenerate as specified by the manufacturer	According to manufacturer's guidelines	N/A	No	N/A	N/A	N/A
Infrequently used outlets	Consideration should be given to removing infrequently used showers, taps and any associated equipment that uses water. If removed, any redundant supply pipework should be cut back as far as possible to a common supply (e.g. to the recirculating pipework or the pipework supplying a more frequently used upstream fitting) but preferably by removing the feeding 'T'	Weekly, or as indicated by the risk assessment	N/A	No	N/A	N/A	N/A
	Infrequently used equipment within a water system (i.e. not used for a period equal to or greater than seven days) should be included on the flushing regime Flush the outlets until the temperature at the outlet stabilises and is comparable to supply water and purge to drain Regularly use the outlets to minimise the risk from microbial growth in the peripheral parts of the water system, sustain and log this procedure once started For high risk populations, e.g. healthcare and care homes, more frequent flushing may be required as indicated by the risk assessment	Weekly, or as indicated by the risk assessment	N/A	No	N/A	N/A	N/A
TMVs	Risk assess whether the TMV fitting is required, and if not, remove	Annually or on a frequency defined by the risk assessment, taking account of any manufacturer's recommendations	Annually	Yes	Annually	Envirocure	Yes
	Where needed, inspect, clean, descale and disinfect any strainers or filters associated with TMVs To maintain protection against scald risk, TMVs require regular routine maintenance carried out by competent persons in accordance with the manufacturer's instructions. There is further information in paragraphs 2.152– 2.168	Annually or on a frequency defined by the risk assessment, taking account of any manufacturer's recommendations	Annually	Yes	Annually	Envirocure	Yes
Expansion vessels	Where practical, flush through and purge to drain	Monthly–six monthly, as indicated by the risk assessment	Quarterly	Yes	Quarterly	Envirocure	Yes

Site: HORSEMONDEN PUBLIC CONVINIENCES

Date: 18/08/2026

Job No.: K14796-01

Head Office: Unit 50-51 Riverside Estate, Sir Thomas Langley Road, Medway City Estate, Rochester, ME2 4DP

Scotland Office: Suite 51 Grovewood Business Centre, Strathclyde Business Park, Bellshill, Lanarkshire, ML4 3NQ

Kent: 01634 726716 | Scotland: 01698 844843 | admin@envirocure.co.uk | sales@envirocure.co.uk

ACoP L8 Table 2.1			Assessor	Written Scheme of Control Checklist for Tasks In Place			
Service	Action to take	Frequency	Recommended Frequency	Relevant	Frequency	Assigned to	Evidence Available to Verify
Chemical rig	Check the dosing unit operation and chemical stocks in the reservoir.	Weekly	N/A	No	N/A	N/A	N/A
	Fill dosing unit reservoir with chemical when required.	Weekly	N/A	No	N/A	N/A	N/A
	Check the operation and equipment of the dosing unit and service mechanical parts.	Annually	N/A	No	N/A	N/A	N/A
Chemical control system	Test the treated water at an outlet close to the point of injection to verify the dosing rate and adjust dosing to establish the required residual at the test point.	Monthly	N/A	No	N/A	N/A	N/A
	Measure the concentration of the chemical at sentinel taps and adjust the dosage to establish the required residual at the sentinel sample points.	Monthly	N/A	No	N/A	N/A	N/A
	Measure the concentration of the chemical at representative taps; and adjust the dosage to establish the required residual at the sentinel sample points.	Monthly	N/A	No	N/A	N/A	N/A
Control verification	Legionella sample	Six Monthly	N/A	No	N/A	N/A	N/A

Site: HORSEMONDEN PUBLIC CONVENIENCES

Date: 18/08/2026

Job No.: K14796-01

Head Office: Unit 50-51 Riverside Estate, Sir Thomas Langley Road, Medway City Estate, Rochester, ME2 4DP

Scotland Office: Suite 51 Grovewood Business Centre, Strathclyde Business Park, Bellshill, Lanarkshire, ML4 3NQ

Kent: 01634 726716 | Scotland: 01698 844843 | admin@envirocure.co.uk | sales@envirocure.co.uk

Glossary

Aerosol	A suspension in a gaseous medium of solid particles, liquid particles, or solid and liquid particles having negligible falling velocity. In the context of this document, it is a suspension of particles which may contain Legionella with a typical droplet size of <5µm that can be inhaled deep into the lungs.
Acid	a chemical that reduces the pH of water and reacts with alkali or base, commonly used for removing scale and other deposits from systems and sometimes used as a scale inhibitor.
Adenosine Triphosphate (ATP)	A chemical used as an energy source in cells for metabolic purposes. Its concentration in water can be used to estimate microbial population density.
Adiabatic Cooler / Condenser	a term used to describe a heat rejection device that normally operates in dry mode but which can also operate using evaporative cooling to pre-cool the air stream with water, to increase the device's cooling capacity when ambient air temperatures are high, e.g. in the summer months.
Aerosol	A suspension in a gaseous medium of solid particles, liquid particles or solid and liquid particles having negligible falling velocity. In the context of this document, it is a suspension of particles which may contain Legionella with a typical droplet size of <5µm that can be inhaled deep into the lungs.
Air conditioning	A form of air treatment whereby temperature, humidity, ventilation and air cleanliness are controlled within limits determined by the requirements of the air-conditioned enclosure.
Algae	A small, usually aquatic, plant that requires light to grow.
Alkali	A chemical that increases the pH of water and reacts with an acid.
Alkalinity	The concentration of alkali in water (measured by titration with standard acid solution).
Antibodies	Substances in the blood that destroy or neutralise toxins or components of bacteria known generally as antigens; and are formed as a result of the introduction into the body of the antigen to which they are antagonistic.
Appointed Responsible Person	The person(s) appointed to ensure the management of the control of Legionella for the property are in place and sufficient for purpose.
Bacteria (Singular Bacterium)	A microscopic, unicellular (or more rarely multicellular) organism.
Balance Pipes	Pipe(s) between adjoining duty towers and between duty and standby towers.
Biocide	A substance that kills microorganisms.
Biofilm	A community of bacteria and other microorganisms embedded in a protective layer with entrained debris, attached to a surface.
Bleed	A deliberate intermittent or continuous discharge of system water to drain to allow the admission of make-up water to the system, thereby controlling the concentration of dissolved or suspended solids in the water.
Blow-down	Another term for bleed.
Bromine	An element very similar to chlorine used as a biocide and sometimes as a disinfectant. The main practical difference between bromine and chlorine when used as a biocide is that bromine remains effective at higher pH levels.
Calorifier	An apparatus used for the transfer of heat to water in a vessel, the source of heat being contained within a pipe or coil immersed in the water.
Chlorinate	To add chlorine to water, usually in the form of a hypochlorite.
Chlorine	An element used as a biocide and for disinfection.
Chlorine Dioxide	A compound used as a biocide.
Cold Water Service	Installation of plant, pipes and fittings in which cold water is stored, distributed and subsequently discharged.
Combined Chlorine	The amount of chlorine that has reacted with nitrogenous or organic materials to form chlorine compounds. If the materials are nitrogenous then the compounds formed are chloramines.
Concentration Factor	Compares the level of dissolved solids in the cooling water with that dissolved in the make-up water (also known as cycles of concentration or concentration ratio). Usually determined by comparison of either the chloride or magnesium concentration.
Conductivity Controller	A device that measures the electrical conductivity of water and helps control it to a pre-set value.
Conductivity	The capacity of the ions in the water to carry electrical current. Conductivity measurement is used to estimate the Total Dissolved Solids (TDS) in the water. The results are expressed as microsiemens/cm (µS/cm) and are temperature dependent. TDS can be calculated by multiplying the conductivity level with a conversion factor of 0.7. Care should be taken not to confuse conductivity and TDS figures (see TDS).
Contact Time	The time a chemical is retained in the system.
Cooling Tower	An apparatus through which warm water is discharged against an air stream; in doing so part of the water is evaporated to saturate the air and this cools the water. The cooler water is usually pumped to a heat exchanger to be reheated and recycled through the tower.
Cooling Water System	A heat exchange system comprising a heat-rejection plant and interconnecting recirculating water pipework (with associated pumps, valves and controls).
Corrosion Coupons	Small strips of various types of metal, placed in racks in water circuits, that can easily be removed, weighed and/or inspected to enable the corrosion characteristics of the water to be assessed.

Corrosion Inhibitors	Chemicals designed to prevent or slow down the waterside corrosion of metals.
Culture	The technique of detecting and enumerating bacteria by growing on an artificial medium such as agar.
Dead End / Blind End	A length of pipe closed at one end through which no water passes.
Deadleg	a length of water system pipework leading to a fitting through which water only passes infrequently when there is draw off from the fitting, providing the potential for stagnation.
Dip Slide	Coated plastic slide on which microorganisms can be grown, examined and quantified. They provide a broad indication of microbial growth only.
Disinfection	The reduction of the number of microorganisms to safe levels by either chemical or non-chemical means (e.g. biocides, heat or radiation).
Dispersant	A chemical that loosens organic material, such as biofilm, adhering to surfaces.
Distribution Circuit	Pipework which distributes water from hot or cold water plant to one or more fittings/appliances.
Domestic Water	Hot and cold water intended for drinking, washing, cooking, food preparation or other domestic purposes.
DPD No 1	An indicator used in the colorimetric determination of the concentration of oxidising biocides. DPD No 1 reacts to the presence of strong biocidal species, including free chlorine and total bromine (free and combined).
Drift	Circulating water lost from the tower as liquid droplets entrained in the exhaust air stream; usually expressed as a percentage of circulating water flow, but for more precise work it is parts of water per million by weight of air for a given liquid to gas ratio.
Drift Eliminator	Equipment containing a complex system of baffles designed to minimise drift (see drift) discharging from a cooling tower or evaporative condenser.
Dry / Wet Cooling Systems	Dry coolers with the capacity to employ evaporative cooling when required either due to high ambient air temperature or when cooling demand is high.
Evaporative Condenser	A heat exchanger in which refrigerant is condensed by a combination of air movement and water sprays over its surface.
Evaporative Cooling	A process by which a small portion of a circulating body of water is caused to evaporate, taking the required latent heat of vaporisation from the remainder of the water and cooling it.
Fouling	Organic growth or other deposits on heat transfer surfaces causing loss in efficiency.
Free Chlorine	The amount of chlorine available to act as a disinfectant in water. Note that disinfection properties are strongly affected by the pH of the water and decline rapidly in alkaline conditions.
Half-life	The time taken for the level of a treatment chemical to decrease to half its original value.
Halogen	A grouping of chemical elements that include bromine and chlorine.
Heat Exchanger	A device for transferring heat between fluids which are not in direct contact with each other.
Hot Water Service	Installation of plant, pipes and fittings in which water is heated, distributed and subsequently discharged (not including cold water feed tank or cistern).
Hypobromite Ion (OBr⁻)	A form of bromine predominant at higher pH levels. While it has biocidal properties, it is less effective as a biocide than HOBr.
Hypobromous Acid (HOBr)	The form of bromine that is most effective as a biocide.
Hypochlorite Ion (OCl⁻)	A form of chlorine predominant at higher pH levels. While it has biocidal properties, it is less effective as a biocide than HOCl.
Hypochlorous Acid (HOCl)	The form of chlorine that is most effective as a biocide.
Incubation Temperature	The temperature dip slides or inoculated culture media should be held at, for long enough for bacterial growth to become evident. The incubation temperature depends on the type of microorganism being tested for in the water sample.
Legionella (plural Legionellae)	A bacterium (or bacteria) of the genus <i>Legionella</i> .
Legionella Pneumophila	A species of bacterium that is the most common cause of Legionnaires' disease and Pontiac fever.
Legionellae	The name of a genus of bacteria which includes over 50 species and belongs to the family <i>Legionellaceae</i> . They are ubiquitous in the environment and found in a wide spectrum of natural and artificial collections of water.
Legionellosis	Any illness caused by exposure to Legionella.
Legionnaires' Disease	A form of pneumonia caused by bacteria of the genus <i>Legionella</i> .
Log Book	A document used to collate information relating to the management of the control of Legionella.
Make-up Water	Fresh water added to a recirculating water system to compensate for losses by evaporation, bleed, drift, windage and leakage.
mg/l (Milligrams per Litre)	A measure of dissolved substances given as the number of parts there are in a million parts of solvent. It is numerically equivalent to ppm (parts per million) with respect to water.
Microorganism	An organism of microscopic size, including bacteria, fungi and viruses.
Neonates	Newborn children.
Nutrient	A food source for microorganisms.
Pasteurisation	Heat treatment to destroy microorganisms, usually at high temperature.

pH	The logarithm of the reciprocal of the hydrogen ion concentration in water, expressed as a number between 0 and 14 to indicate how acidic or alkaline the water is. Values below 7 are increasingly acidic, 7 is neutral, and values higher than 7 are progressively alkaline. However, acidity and alkalinity are not proportional to pH (see acidity and alkalinity).
Planktonic	Free-floating microorganisms in an aquatic system.
Point of Use (POU) Filters	A filter with a maximal pore size of 0.2 µm applied at the outlet, which removes bacteria from the water flow.
Pontiac Fever	A disease caused by a species of Legionella, an upper respiratory illness less severe than Legionnaires' disease.
ppm (Parts per Million)	A measure of dissolved substances given as the number of parts there are in a million parts of solvent. It is numerically equivalent to milligrams per litre (mg/l) with respect to water.
Risk Assessment	Identifying and assessing the risk from exposure to Legionella from work activities and water sources on premises and determining any necessary precautionary measures.
Scale Inhibitor	Chemical added to water to inhibit scale formation.
Scaling Indices	These are predictors for the scale-forming or corrosive properties of water.
Sentinel Taps	For hot water services – the first and last taps on a recirculating system. For cold water systems (or non-recirculating HWS), the nearest and furthest taps from the storage tank. The choice of sentinel taps may also include other taps which represent parts of the recirculating system where monitoring can aid control.
Sero-group	A sub-group of the main species.
Service Provider	companies or individuals or their sub-contractors who are involved with providing advice, consultancy, operating, maintenance and management services or the supply of equipment or chemicals to the owner or occupier of premises.
Sessile	Aquatic microorganisms adhering to a surface, normally as part of a biofilm.
Shot Dose	A single dose of a chemical, sometimes called a 'shock' or 'shot' dose. It can also describe routine high concentration periodic dosing (such as with non-oxidising biocides or dispersants) to distinguish it from maintaining a low concentration of chemical continuously.
Shunt Pump	A circulation pump fitted to hot water service/plant to overcome the temperature stratification of the stored water.
Slime	A mucus-like exudate that covers a surface produced by some microorganisms.
Sludge	A general term for soft mud-like deposits found on heat transfer surfaces or other important sections of a cooling system. Also found at the base of calorifiers and cold water storage tanks.
Stagnation	The condition where water ceases to flow and is therefore liable to microbiological growth.
Statutory Duty Holder	The person(s) with overall responsibility to ensure the health and safety requirements of the property are met.
Strainers	A coarse filter usually positioned upstream of a sensitive component such as a pump control valve or heat exchanger to protect it from debris.
Thermal Disinfection	Heat treatment to disinfect a system.
Thermostatic Mixing Valve (TMV)	A mixing valve in which the temperature at the outlet is pre-selected and controlled automatically by the valve.
Total Dissolved Solids (TDS)	The quantity of solids dissolved in the water, measured in mg/l. These solids will typically include calcium and magnesium (sodium in softened water), bicarbonate, chloride, sulphate and traces of other materials. TDS can be measured directly or determined indirectly from the conductivity reading (see conductivity).
Total Viable Counts (TVC)	The total number of culturable bacteria (per volume or area) in a given sample (does not include Legionella).
Turbidity	The opacity of a liquid, e.g., cloudiness caused by a suspension of particles.
Water Safety Group (WSG)	A multidisciplinary group formed to undertake the commissioning and development and ongoing management of the water safety plan (WSP). It also advises on the remedial action required when water systems or outlets are found to be contaminated and the risk to susceptible patients is increased.
Water Safety Plan (WSP)	A risk-management approach to the safety of water that establishes good practices in local water distribution and supply. It will identify potential hazards, consider practical aspects, and detail appropriate control measures.
Wholesome Water	Water supplied for such domestic purposes as cooking, drinking, food preparation or washing; or supplied to premises in which food is produced
Windage	Water lost when wind forces an unusual flow pattern through the base of a cooling tower and blows droplets out of the tower.
Written Scheme of Control	A written control system to ensure the control of the risk from exposure to Legionella is properly implemented and managed.

Summary of Services

Legionella Management and Control Services

- **Risk Assessments** in compliance with ACoP L8 4th Edition and BS 8580-1:2019
- Manual, electronic and online **Log Books**
- **Legionella Control Systems** to ACoP L8 and client bespoke requirements
- **Disinfection / Chlorination** to BS 8558, PD 855468 and HSG274 Part 2
- UKAS accredited **Sampling and Analysis**
- Risk Assessment and Written Scheme of Control **Remedial Actions**
- **Calorifier Surveys and Inspections via Borescope / Endoscope**
- **Calorifier and Water Heater Descales**
- **TMV Servicing, Calibration and Scald Risk Assessment**

Hot and Cold Water System Modifications

- **Stored Water Tank Disinfection / Chlorination** to BS 8558, PD 855468 and HSG274 Part 2
- **Flexi hose** replacements
- **Stored Water Tank Replacements and Upgrades** including **Made to Measure Lids**
- **Stored Water Tank Hollow Support and Hollow Ladder Replacements** in accordance with EFA/2013/004
- **Stored Water Tank Lining and Coating**

Pseudomonas Management and Control

- **Risk Assessments** in compliance with HTM 04-01: Addendum
- UKAS accredited **Detection Analysis**
- Pseudomonas removal by **System Modification, Disinfection or Long Term Chemical Treatment and Dosing**

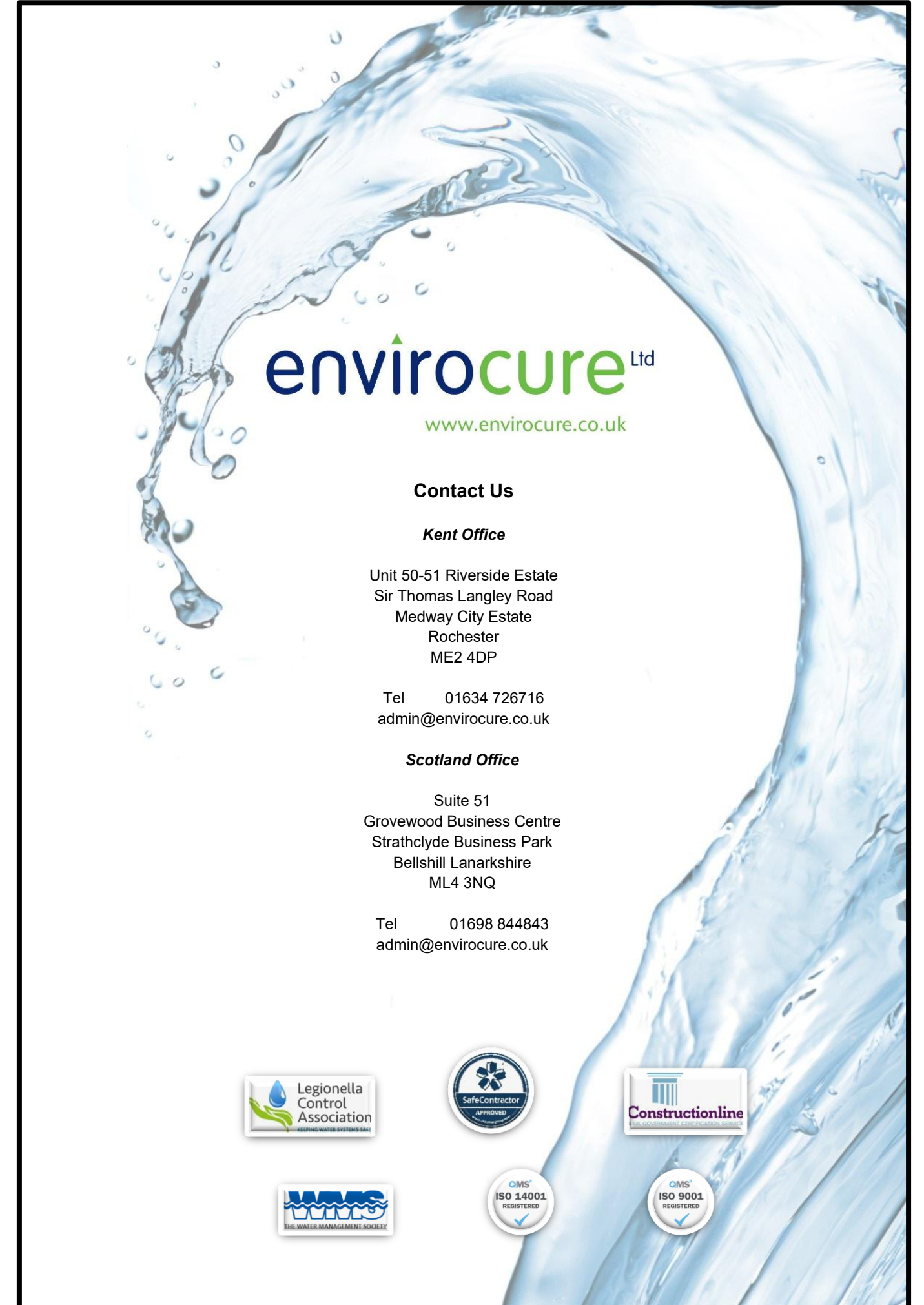
Ventilation Maintenance and Air Hygiene

- **Ductwork Cleaning and Sanitisation** to BESA (formerly B&ES / HVCA) and HTM standards
- **Ventilation System Hygiene Audits** to TR/19 and TM26 standards
- **Fire Damper Inspection, Service and Maintenance** to BS 9999
- **Access Door Fitting** to DW144
- UKAS accredited **Fixed Air Volume Analysis**
- **Kitchen Extract Cleaning** contracts
- **Kitchen Filter Cleans and Replacement** service
- **AHU Refurbishment**
- **System and AHU Clean and Sanitisation**

Water Treatment

- Heating and chilled **Closed System Analysis and Treatment**
- **New and Existing System Flushing** to general cleaning standards
- **Hot and Cold Water System Disinfection / Chlorination** to BS 8558 and PD 855468
- **Automated / Constant Treatment Systems** including inhibitor, biocide, chlorine dioxide and red water treatment

Secure Internet Information Retrieval Service Available to Clients



envirocure^{Ltd}

www.envirocure.co.uk

Contact Us

Kent Office

Unit 50-51 Riverside Estate
Sir Thomas Langley Road
Medway City Estate
Rochester
ME2 4DP

Tel 01634 726716
admin@envirocure.co.uk

Scotland Office

Suite 51
Grovewood Business Centre
Strathclyde Business Park
Bellshill Lanarkshire
ML4 3NQ

Tel 01698 844843
admin@envirocure.co.uk

