



Derby City Council

one Derby one council

DERBY CITY COUNCIL
WATER HYGIENE POLICY

REVISION 1

APRIL 2012

INTRODUCTION

1. This policy aims to
 - standardise and update the water hygiene procedure across all directorates
 - make sure the Council meets its legal duty to protect everyone from exposure to harmful bacteria
 - prevent the formation of harmful bacteria by developing and implementing a scheme of management to make sure hazards are identified and dealt with quickly.
2. All corporate H&S policy and guidance documents are available on the:
 - Council's intranet, Derbynet. To find them from the homepage, go to Human Resources, then Health and Safety and choose an appropriate theme. Alternatively, follow this link - [Derbynet: HR Health and Safety](#).
 - [schools' pages](#) on the Council's website.

You can also get copies from the Corporate Health and Safety Advisory Service. Our contact details are given in paragraph 33. Managers with employees who can't access Derbynet or the Web must set up alternative arrangements to make sure they get appropriate H&S information. This might be by printing information off and circulating it or handing out copies at team meetings.
3. The Council is committed to protecting its employees' health, safety and well-being. We believe that the best way to do this is through a proactive health and safety management system

Background

4. Legionellosis is the term given to infections caused by bacteria from the family Legionellaceae. Legionnaires' disease is a potentially fatal form of pneumonia that principally affects those who are susceptible due to age, illness, immunosuppression and smoking etc.
5. The disease is on average fatal in 12% of cases. The bacteria may also cause less serious illness, which is non-fatal or permanently debilitating but which can affect all people.
6. Infection is caused by inhaling legionellae bacteria, either in water droplets, which are small enough to penetrate deeply into the lungs, or in droplet nuclei - particles which are left after the water has evaporated.
7. Legionellae are widespread in natural sources of water such as rivers, lakes and reservoirs. They can enter man made water systems and services, where, under favourable conditions, they can proliferate and if there is a means of creating and transmitting water droplets, people in the surrounding vicinity may be put at risk.
8. Outbreaks of legionellosis have been associated particularly with air-conditioning cooling towers and domestic hot and cold water systems.
9. To reduce the possibility of creating water conditions in which the risk from exposure to legionella bacteria is increased, it is important to control risk by introducing measures which;

- do not allow the proliferation of the organisms in the water system
 - reduce, so far as reasonably practicable, exposure to water droplets and aerosol.
10. Legal duties requiring the control of legionella bacteria in water systems are provided by:
The Health and Safety at Work etc Act 1974
- The Management of Health and Safety at Work Regulations 1999
 - The Control of Substances Hazardous to Health Regulations 1999

Responsibilities

11. The Approved Code of Practice (ACOP) 'control of legionella bacteria in water systems', issued by the Health and Safety Commission under The Health and Safety at Work etc Act, 1974, gives practical guidance on meeting responsibilities under the above legislation. Current legislation states that the duty to manage a property is held by the owner / employer of that property. It is important to note that the law states that duty cannot be delegated (yet an individual may delegate management responsibility for that duty). Therefore, the dutyholder for the majority of council buildings (excluding Foundation and Voluntary Aided Schools) will be the Chief Executive via the Chief Officer's Group, and responsibility for this duty will be delegated through the Council management chain to the relevant Heads of Service.
12. The responsibility for the management of individual sites falls to Site Managers and/or Head Teachers (whoever holds the budget for maintenance of the building) which includes the responsibility to ensure that a suitable and sufficient assessment and to implement the control measures and strategies identified.
13. To comply with their legal duties, employers and those with responsibilities for the control of premises should
- a. • identify and assess sources of risk
 - b. • prepare a scheme for preventing or controlling the risk
 - c. • implement, manage and monitor precautions
 - d. • keep records of precautions
 - e. • appoint a person to be managerially responsible.

Policy

14. Derby City Council is committed to protecting everyone from exposure to harmful bacteria which may grow within the water systems in its properties.
15. Developing and implementing a scheme of management, to include the following actions, will achieve this.

Identify and assess sources of risk

16. For all properties, carry out surveys that will include risk assessments for each point of use or water outlet.
17. Create schematic drawings for all water systems on each site detailing the salient equipment.
18. Maintain an asset schedule detailing all water consuming assets at each site and use this as the basis for letting all contracts associated with water hygiene.

Prepare a scheme for preventing or controlling risks

19. Create a log book for each site which will contain the risk assessment as well as the scheme of management which will include site specific tasks and log sheets.
20. Make recommendations as necessary for risk reducing remedial works. Frequencies for housekeeping works will be determined by taking into consideration the site type, susceptibility of exposed population and their numbers, likelihood of respirable droplet formation and the extent of the water system.

Implement, manage and monitor precautions

21. Carry out remedial actions recommended in the risk assessment report on a risk reduction priority and funds availability basis.
22. Engage specialist contractor(s) to carry out the more involved housekeeping / planned maintenance tasks.
23. Site based staff (where there are any) will carry out the weekly and monthly housekeeping tasks identified in the site log book.
24. Engage specialist consultant(s) to carry out audits of all properties, update risk assessments, schematic drawings and log books as appropriate and check that the maintenance and housekeeping tasks have been carried out and recorded as required.
25. Periodically measure the effectiveness of the scheme implementation and report with recommendations as necessary.
26. Periodically consult with the employees and safety representatives to improve awareness and seek suggestions for continuous improvement.
27. Create and implement a change management procedure to ensure that risk assessments, procedures and records maintain their currency.
28. Define and assess the competence of staff, consultants and contractors prior to engaging them in any activity relating to water systems hygiene.
29. Provide training, and periodically refresher training, for all staff involved in the scheme of management.

Keep records of the precautions

30. Require that all measures taken be recorded in the site logbook and that these are checked as part of the auditing procedure.

Review

31. This policy will be subject to periodic review to ensure it continues to meet legal requirements annually.

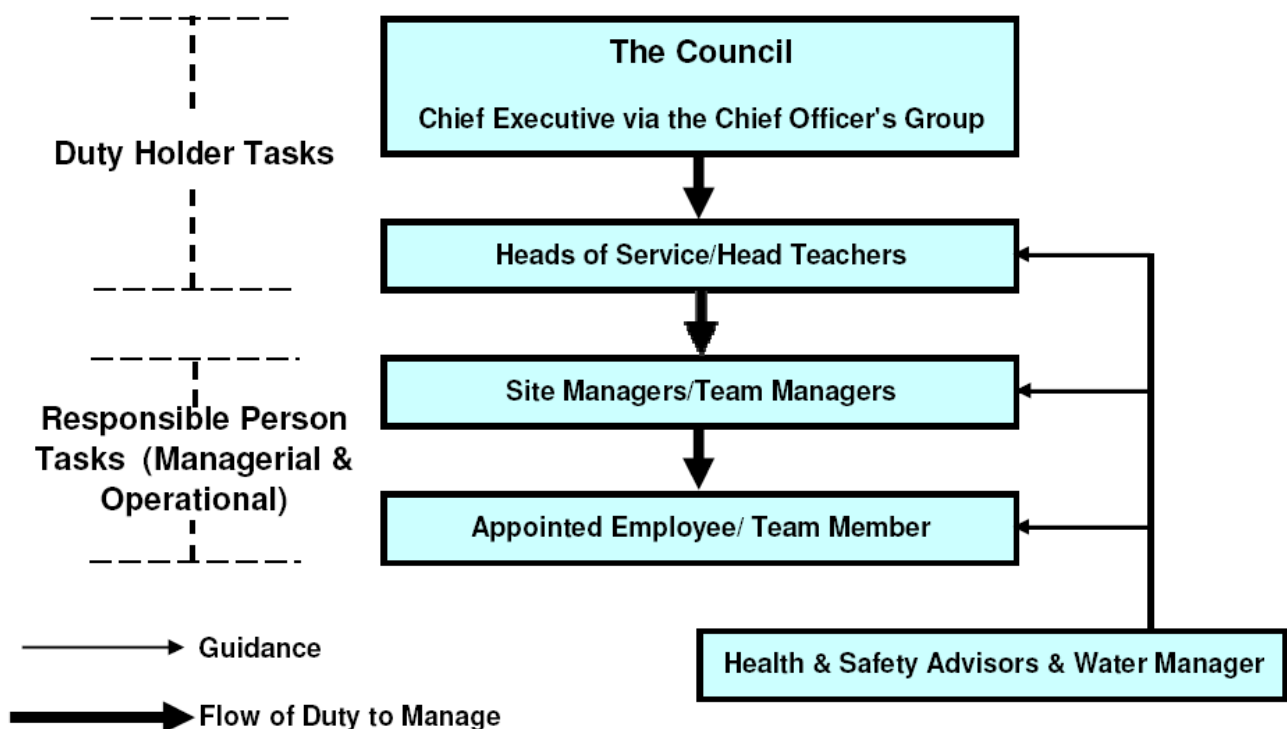
Scheme of Management

32. The scheme of management to implement the Policy is included at Appendix A.

Roles and Responsibilities

33. The roles and responsibilities of key positions within the management chain are defined in Appendix B. An overview is given in figure 1 below;

Figure 1: Duty to manage chain for Corporate Buildings*, Community Schools and Voluntary Controlled Schools (Does not apply to Foundation and Voluntary Aided Schools)



*Applies to Corporate Buildings unless specifically confirmed in the lease.

WHERE TO GET HELP

Within the Council

34. You can get more information and advice on this policy from:

- your health and safety adviser and other members of CHSAS
- your trade union health and safety representative

Outside the Council

35. You can also get help from outside the Council. Here are some contacts you may find useful;

The Health and Safety Executive



- www.hse.gov.uk.

This includes a range of information including free leaflets to download.

Two useful ones dealing with accidents are:

– RIDDOR Ring and Report

<http://www.hse.gov.uk/pubns/misc769.pdf>

– Incident-reporting in schools: accidents, diseases and dangerous occurrences

<http://www.hse.gov.uk/pubns/edis1.pdf>

– HSE RIDDOR web page

www.hse.gov.uk/riddor/index.htm



- HSE InfoLine - **0845 345 0055** Minicom - **0845 408 9577**

The HSE have translated a number of their publications into languages other than English. You can find out more from their [Languages webpage](#). They also have an interpreting service you can contact by calling **0845 345 0055**.

HSE Books



- **01787 881165**



- www.hsebooks.co.uk

The Trades Union Congress, TUC



- www.tuc.org.uk



- **020 7636 4030**

UNISON



- www.unison.org.uk



- **01332 64 3216 or 3217** - Branch UNISON Office

GMB



- www.gmb.org.uk



- **0115 960 7171** - Nottingham Office

NASUWT

 - dwilkinson@saintben.derby.sch.uk

 - **0797 104 1577**


NUT


 - www.teachers.org.uk

 - **01302 342448** - Regional Office

Unite

 - www.unitetheunion.org.uk

 - Amicus - **01332 548400** - Derby Office

 - T&G - **01332 345851** - Derby Office

WATER HYGIENE POLICY - SCHEME OF MANAGEMENT

Introduction

1. The purpose of this scheme of management is to meet the requirements of the City Council policy on water hygiene.
2. The five areas covered by this scheme of management are:
 - identify sources of risk
 - prepare a scheme for preventing or controlling risks
 - implement, manage and monitor precautions
 - keep records of the precautions
 - periodically review the scheme

Note

3. Budgets for reactive repairs and servicing are delegated to schools. Maintenance and Energy offers a service to schools that embraces this scheme of management. Schools that choose not to use this service should adopt an equal scheme of management.
4. A technical specification for the tasks involved is available from Maintenance and Energy.

Identify and assess sources of risk

5. Employ the services of a suitably qualified professional consultancy to carry out the following:
6. Visit each site and carry out a survey and inspection of the water systems present in all buildings at that site. Take water samples and test
7. Prepare a report detailing all findings, including schematic drawings, risk assessments and recommendations for remedial works.

Prepare a scheme for preventing or controlling risks

8. Employ the services of a suitably qualified professional consultancy to carry out the following:
9. For each site subject to a risk assessment process, prepare a site specific log book to detail one full year's required management tasks as they relate to maintaining the specific water systems hygiene on that site and recording all results and actions.

Implement, manage and monitor precautions

10. Carry out remedial actions recommended in the risk assessment report on a risk reduction priority and funds availability basis. Update the risk assessment and log book to reflect the effect of remedial actions.
11. Engage specialist contractor(s) to carry out the more involved housekeeping/planned maintenance tasks, e.g. quarterly, six monthly and annual, as detailed.

12. Site based staff (where there are any) will carry out the weekly and monthly housekeeping tasks and associated record keeping identified in the site log book. Properties where there are no site based staff yet which risk assessments show have a weekly or monthly housekeeping will be identified and a contract set up for an outside contractor to carry out the necessary works. Weekly and monthly housekeeping tasks are detailed. Site based staff will also carry out the start up task as and when required.
13. Employ specialist consultant(s) to carry out annual audits of all properties, update risk assessments, schematic drawings and log books as appropriate and check that the maintenance and housekeeping tasks have been carried out and recorded as required and to report their findings to Maintenance and Energy.
14. Where any temperatures when measured are observed to be out of limits this fact must be reported in writing to the responsible person for the site. The responsible person is named and defined in the water hygiene log book. Usually this could be achieved by copying the completed Fault Action log sheet to them. The responsible person must seek the advice of Maintenance and Energy in such an event.

Keep records of the precautions

15. All remedial measures taken and details of any new works shall be recorded in the site logbook and these shall be checked as part of the auditing procedure.
16. All housekeeping works shall be recorded on the appropriate sheets within the log book.
17. All audit visit reports and any other inspections shall be recorded in the log book.
18. The asset schedule in the logbook shall be kept up to date and Maintenance and Energy informed of all changes so that the currency of their records can also be maintained.

Review

19. The scheme of management will be subject to periodic review to ensure it continues to meet legal requirements.
20. In the event of a positive legionella test result, the scheme of management will be reviewed firstly for the site in question but if considered necessary the review will be widened to cover all other appropriate sites. Details of what to do in the event of a positive legionella test result are covered in more detail in points 89 to 96
21. The findings of the review shall be implemented as soon as possible within budget constraints – if necessary, additional funds may need to be urgently sought.
22. Periodically measure the effectiveness of the scheme implementation and report to the Director of Planning and Facilities Management with recommendations as necessary.
23. Periodically consult with the employees and safety representatives to improve awareness and seek suggestions for continuous improvement.
24. The results of any changes shall be communicated to the Responsible Person, for all affected sites, so that the respective site log book(s) can be updated and new procedures implemented.

DETAILS OF WEEKLY AND MONTHLY TASKS REQUIRED OF SITE BASED PERSONNEL

25. The housekeeping tasks necessary will vary from site to site depending upon which equipment is installed there and how it is used. The schedule below details all of the possible tasks needed at both monthly and weekly frequencies as well as start up tasks to be carried out after a school holiday or period during which a system is out of use.
26. Some tasks will not be possible until modifications have been made to parts of the system. For example flushing of some hot water tanks cannot be achieved until a suitable drain valve or means of drainage has been installed.
27. Where any temperatures when measured are observed to be out of limits this fact must be reported in writing to the responsible person for the site. The responsible person is named and defined in the water hygiene log book. Usually this could be achieved by copying the completed Fault Action log sheet to them. The responsible person must seek the advice of Maintenance and Energy in such an event.

ADDITIONAL SERVICES WHICH MAY BE REQUIRED FROM TIME TO TIME

28. System start up tasks after site shut down for more than one week

Start up of cold and drinking water services

29. In the week immediately prior to a site opening, cold and drinking water services are to be flushed at the nearest and furthest locations from the cold water storage cisterns/incoming mains supply and temperature recorded. In addition, representative locations throughout the building should be checked, for example, and based on caretaker's knowledge of the building layout, excessive runs from main pipe work to remote areas.
30. Temperatures should be recorded after two minutes of opening any tap outlet and should ideally be 20° C or less, although a maximum of 22° C would be tolerable. If this temperature is not achieved within two minutes, the tap should continue to be flushed to within the maximum tolerable temperature.

31. All actions should be recorded and logged in the water systems hygiene log book.

Start up of hot water services

32. In the week immediately prior to a site opening, hot water calorifiers should be heated to 60° C throughout and held for one hour (these are minimum temperatures and periods of time). Following this, all hot water services should be flushed and temperatures recorded.
33. Temperatures should be recorded after one minute of opening any tap outlet and should achieve between 55° and 60° C. These procedures will almost certainly require time to allow calorifier recovery in larger buildings and may also require calorifier temperatures to be raised in excess of 60° C to achieve the required tap outlet temperatures.
34. Record all actions in the water quality log book.

WEEKLY TASKS

Hot water tanks generally

35. Check the operating flow temperature, which should be at least 60°C. This is the temperature the water is being stored at. Record this temperature.

36. The operating flow temperature should be checked by either:

- Observation of an accurate gauge installed near the flow outlet
- Measurement of nearest hot tap temperature at steady state
- Measurement of the hot water flow pipe surface temperature.

37. Change over duty / stand by circulating pumps if fitted.

38. Check and record the return water temperature; should be at least 50 ° C.

Hot water tanks without anti-stratification devices

39. Flush water out of the drain valve and measure the temperature. Continue flushing until the water reaches 60°C or above. Continue flushing for a further 2 minutes.

40. This process should be carried out when there is no hot water demand and the calorifier or other vessel is valved off from the system.

Hot and cold taps and showers - flushing of low use areas

41. Flush hot and cold water services in areas which by design or low use do not regularly achieve normal distribution temperatures.

42. Open each outlet in turn on full flow and run until system distribution temperature is reached, i.e. hot above 50 °C, cold below 20 °C.

43. Continue flushing for further 1 minute. For showers, this procedure should be carried out with the mixers at the max hot setting and max cold setting.

44. Record the current areas / outlets purged on the log sheet and highlight areas which cannot attain temperatures. Ensure that areas / buildings which are temporarily closed are brought on to the list.

45. Complete all appropriate entries on the weekly log sheet and date and sign the sheet.

MONTHLY TASKS

46. These monthly tasks are to be carried out in addition to all weekly tasks.

Hot and cold taps - temperature check

47. Run the cold taps nearest to and furthest from the cold water storage tanks for 2 minutes. Measure and record the temperatures which should be 20 °C or less. (For non storage systems go to nearest and furthest point from incoming main).

48. Run the hot taps nearest to and furthest from the hot water tank(s) for 1 minute. Measure and record the temperatures, which should be at least 50 °C.

49. If a thermostatic mixing valve (TMV) has been fitted to reduce the hot water temperature from the tap to around 42°C at one or more of these nearest and furthest points you should measure the temperature of the hot water supply into the TMV using a surface temperature probe on the hot water supply pipe to the valve. Record the temperature, which should be at least 50°C.

50. Temperature check locations are specified on the 'site information' sheet.

Electric point of use heaters

51. Run the hot water outlet for 1 minute. Measure and record the temperature. If less than 50°C then reset the thermostat so as to achieve 50-60°C.

52. Complete the monthly log sheets date and sign each one.

QUARTERLY TASKS

53. These quarterly tasks are to be carried out in addition to all weekly and monthly tasks.

Calorifiers and other hot water vessels, including unvented water heaters

54. Check for leaks at pipe joints and gaskets.

55. Ensure that all valves are operational and ease those which are not.

56. Where fitted, manually operate all pressure and temperature relief valves, check that they reseal properly and that the water drains away via the tundish.

57. Showers and spray head taps, including taps with flow straighteners

58. Examine all shower heads, hoses and spray/flow straightener taps for flow pattern, scale and other deposit build up. Clean, de-scale and disinfect.

59. Ask site staff, preferably the Responsible Person, about the frequency of use of each shower installation and note installations which have become low use i.e. fewer than 2 or 3 times per week. Note the locations of low use showers on report sheet.

Generally

60. Complete the Quarterly log sheets; date and sign each one. File in the quarterly section

SIX MONTHLY

61. These six monthly tasks are to be carried out in addition to all weekly, monthly and quarterly tasks.

Thermostatic and shower mixing valves and mixer taps

62. Check and test each thermostatic and shower mixer valve and its associated check valves and strainers.

63. Adjust thermostatic mixing valve to correct operating temperature.

64. Check and record the valve input and leaving temperatures.

Incoming mains cold water and cold water storage cisterns

65. Check the temperature of the water in each cold water storage cistern and record the temperature. Cold water should be 20 °C or below.

66. Check and record the incoming mains cold water temperature.

Hot and cold water distribution

67. Test the general water quality in the hot and cold water distribution systems at the outlets where monthly temperature measurement is taken – this can be established from the log book on site. Test for total count of bacteria using simple dip slide method.

68. These results will assist in evaluating the condition of the water system and can be used in conjunction with visual observations to determine the need for cleaning and disinfection.

69. Calorifiers and other domestic hot water vessels, including hot water tanks

70. Check for leaks at pipe joints and gaskets.

71. Ensure that all valves are operational and ease those which are not.

72. Ease and maintain drain valve (if fitted).

Fire hose reels

73. Discharge directly to drain during testing and minimise exposure to aerosols. Record the water temperature on completion of discharge.

Generally

74. Complete the six monthly log sheets, date and sign each one. File in the six monthly section

ANNUAL TASKS

75. These annual tasks are to be carried out in addition to all weekly, monthly, quarterly and six monthly tasks.

Thermostatic mixing valves (TMV's)

76. Carry out a full service of each TMV including a fail safe check of the thermal shut down. Clean and descale strainers and filters

Calorifiers and other domestic hot water vessels, including hot water tanks and direct gas fired water heaters

77. Locate the drain valve in the base of the storage vessel open the valve to run off any accumulated scale or sludge. Inspect this sample and carry out a full internal clean and de-scale as necessary. Where calorifiers have bolted tops or an access hole they should be opened and physically cleaned internally.

78. Re-commission to working temperature on completion of tasks.

79. Check temperature gauge against nearest hot tap temperature. Recalibrate if required or replace if defective.

Cold water storage cisterns

80. Check the operation of valves associated with the cistern and ease, repack etc. as required.

81. Inspect the cistern for any foreign objects, biological material, sediment, corrosion, deterioration and build up of debris. Report findings on 'comments' sheet.

82. Check operation of float valve for operation at correct water level and for full discharge flow.

83. Refit cistern cover(s), inspect the overflows and ensure that screening on pipes open to atmosphere is in place.

Point of use heaters and domestic hot water calorifiers

84. Where the point of use heaters and domestic type cylinders incorporate cold water storage facilities, inspect the storage cistern for foreign objects, biological material and other deterioration and clean plus disinfect as required.

Hot and cold water taps – temperature measurement

85. Check and record the hot and cold water temperatures at a representative number of taps on a rotational basis year by year all in accordance with HSE ACOP L8 Table 3.

Expansion and accumulator vessels

86. Where possible open all such vessels on mains pressurised and boosted pressure systems and inspect both the diaphragm and vessel shell. Clean and disinfect as necessary. Return the system to normal working conditions and ensure vessel working pressure is correct.

Generally

87. Complete the annual log sheets date and sign each one. File in the annual section

What to do in the event of a positive legionella result.

88. If the Water Manager (or a suitably trained person) is not available to make an informed decision then follow guidance below for 'More than 1000 cfu/litre'

89. The table overleaf determines the following action level;

LEGIONELLA BACTERIA CFU/LITRE	ACTION REQUIRED
Less than 100	No action necessary
More than 100 but less than 1000	<p>Either:</p> <p>If only one or two samples are positive, system should be re-sampled. If a similar count is found again, a review of the control measures and risk assessment should be carried out to identify any remedial actions.</p> <p>If the majority of samples are positive, the system may be colonised, albeit at a low level, with Legionella. Disinfection of the system should be considered, especially if sero group 1 is detected. An immediate review of control measures and risk assessment should be carried out to identify any further remedial action required. System should be re-sampled.</p>
More than 1000	The system should be immediately isolated, disinfected and re-sampled. Carry out an immediate review of the control measures and risk assessment to identify any remedial problems.

90. Call the site manager or head teacher and explain that Legionella has been identified in their water system. Explain what actions we (Maintenance and Energy) are taking. If the bacteria count is more than 1000 cfu/litre then issue instructions that the affected water outlets must be immediately put out of use. If necessary, someone from the Maintenance and Energy team should organise for the entire system to be isolated.

91. Arrange for the appropriate action (as decided from the table above) to be taken using a specialist contractor within 24 hours of the Legionella positive notification

92. Carry out a review of control measures and the risk assessment. These should include:

- Control measures - Inspection of the log book
- Check on temperature controls
- Check on treatment controls (if applicable)
- Risk Assessment - Check if recommended remedial works actioned
- Check risk assessment for errors
- Check on any changes to the system
- Investigate any changes in use of the building

93. Write a brief report explaining how Legionella was detected, what actions were taken, any findings from the review and confirmation of the resample result.

94. Act on parts of the review that Maintenance and Energy are responsible for. Confirm in writing to the site manager what actions they are responsible for and offer assistance where required.

95. Arrange for further Legionella samples to be taken at one, three, six and twelve months after the positive result of more than 1000 cfu/l. After this the test regime may revert to the normal scheme of management.

PAGE INTENTIONALLY BLANK

WATER HYGIENE POLICY - ROLES AND RESPONSIBILITIES

Appendix B

Role	Definition	Corporate buildings	Foundation schools	Aided schools	Community and other schools
*Duty holder	The person or organisation upon whom the statutory duty falls: the employer	The Council itself and/or the Chief Exec	The Governors	The Governors	The Council itself and/or the Chief Exec
*Duty holder 1	The person appointed by the duty holder to be manage the duty holder tasks.	Strategic directors - who then delegate responsibility to duty holder 2	The Governors/The head teacher	The Governors/The head teacher	The Governors
*Duty holder 2	The person to whom the responsibility has been delegated by Duty holder 1	Director of Planning & Facilities Management in most cases	This level of delegation is unlikely in a school	This level of delegation is unlikely in a school	This level of delegation is unlikely in a school
*Responsible Person	The person appointed by Duty holder to be financially responsible for implementation of the control regime	Head of Maintenance & Energy Heads of Service	The head teacher	The head teacher	The head teacher
*Person operationally responsible	The person appointed by the responsible person to be operationally responsible for implementation of the control regime.	Maintenance Manager and Compliance Manager	Likely to be the site manager or if none then the head teacher	Likely to be the site manager or if none then the head teacher	Likely to be the site manager or if none then the head teacher
Person/team operationally responsible for services maintenance	The team appointed by the responsible person to be operationally responsible for implementation of the control regime	Maintenance Team Leader and Compliance Team Leader and their teams	The site manager and their staff	The site manager and their staff	The site manager and their staff
*Site operatives	Those site based staff which have weekly and monthly duties under the control regime	The building manager and their staff	The site manager and their staff	The site manager and their staff	The site manager and their staff

Role	Definition	Corporate buildings	Foundation schools	Aided schools	Community and other schools
*Contractors	Those contractors who carry out specialist duties beyond the ability/training of site staff under the control regime on behalf of those operationally responsible for implementation of the control regime	Water treatment contractors, housekeeping measures contractors and equipment servicing contractors	Water treatment contractors, housekeeping measures contractors and equipment servicing contractors (all provided by the Servicing package) if taken up	Water treatment contractors, housekeeping measures contractors and equipment servicing contractors (all provided by the Servicing package) if taken up	Water treatment contractors, housekeeping measures contractors and equipment servicing contractors (all provided by the Servicing package) if taken up
*Consultants	Those consultants who carry out the identification and assessment of risk, draw up the control regime and audit its implementation on behalf of those operationally responsible	Specialist consultants. Currently Vectair	Specialist consultant - provided by the Servicing package for annual audits - if the package is taken up	Specialist consultant - provided by the Servicing package for annual audits - if the package is taken up	Specialist consultant - provided by the Servicing package for annual audits - if the package is taken up
Systems of deputising	To provide continuity in the absence of the specifically named person an adequate scheme of deputising must be in place and documented	Generally the named person's deputy should be their line manager - this avoids potential 'lack of sufficient authority' blockages when urgent decisions have to be taken	Generally the named person's deputy should be their line manager - this avoids potential 'lack of sufficient authority' blockages when urgent decisions have to be taken	Generally the named person's deputy should be their line manager - this avoids potential 'lack of sufficient authority' blockages when urgent decisions have to be taken	Generally the named person's deputy should be their line manager - this avoids potential 'lack of sufficient authority' blockages when urgent decisions have to be taken
* Roles defined in the ACOP L8	Legionnaires' Disease The control of legionella bacteria in water systems.				
	The other roles have been added to try and make the City Council structures fit the ACOP				