

## HLA SERVICES LTD COVID-19 CLIENT POLICY

To all of our clients;

During the current COVID -19 ongoing situation some of our engineers are being turned away from site due to concerns over COVID-19. We must bring to our clients attention that The Health and Safety at Work Act 1974 still applies in the current situation and as such an employer or those in control of premises must continue to manage any risk arising from their activity and this includes legionella control.

Whilst the decision to turn contractors away or to close client sites is a wholly individual business decision for our clients and one that HLA Services will fully support and respect, we must remind our clients that as the company responsible for keeping our clients compliant, then, control measures in place may need to be adapted to changing circumstances, as Duty holders you must still be able to demonstrate control of risk to a reasonably practicable level. Duty holders are less likely to have access to competent help on site while adapting control measures due to social distancing and self-isolation.

Many legionella control activities are monitoring measures rather than interventions and there may be some flexibility in how these are maintained during the COVID-19 situation (but currently we can't confirm this flexibility) Other systems such as gas, electrical and critical cooling systems may require interventions by service providers to remain safe and these should not be neglected. Each system should be considered individually by the Duty holder, risk assessed, and control measures amended where necessary.

Our advice to all of our clients is to follow the latest government advice available at [www.gov.uk](http://www.gov.uk) on measures to take and how to work.

There can be a significant element of work that must be completed on site and is likely to be time critical. In this respect this could be considered as essential travel and should continue unless alternative arrangements have been made. Unless there is reason for individuals to stop working, staff should take the appropriate hand washing, social distancing and other recommended measures and continue these essential activities. We can offer the following reassurances to our clients on the measures we can put in place to minimise disruption of COVID-19 to business whilst maintaining compliance

## **Advice for Clients**

1. Make sure you are aware of your responsibilities under the law and how any COVID-19 actions you take may be compromising the control of legionella bacteria on your site. Make any amendments to this in writing in case of future prosecutions or audits.
2. To ensure ongoing control including closure of buildings we can offer a safe shutdown of water systems if a building is to be closed.
3. Document all of the communication around any refusal of site access for any future prosecution or audits. We will also document this where we cant have access for compliance visits.
4. We can advise on what is needed to safely recommission water systems when buildings reopen.
5. If buildings or water systems are isolated during the COVID-19 outbreak, the length of time involved may not have been known at the outset and control measures might not have been considered. Staff may not have been available to flush to simulate usage. Assess the risk – it is unlikely that buildings can simply be reopened with no additional measures.

Start-up procedures for systems may need to be reconsidered before buildings can be reopened. Consideration should be given to water system cleaning and disinfection and/or controlled flushing to mitigate the risk from prolonged stagnation. Sampling may be useful to demonstrate effectiveness of control measures.

6. At all times follow the current GOV.UK advice and daily briefings.

## Specific Guidance for Evaporative Cooling Systems

Evaporative cooling systems are likely to require intervention to remain safe such as replacing chemical stocks, adjusting dosing levels and calibration of sensors. They should also be decommissioned properly rather than simply switched off, to minimise legionella risk when they are recommissioned.

At all times HLA Services Ltd are here to support you and your business and especially through this extremely difficult time for our businesses and our industries, we currently remain resilient with our own emergency procedures in place to ensure that our own staff are individually protected as far as reasonably practicable, if you have any concerns about your compliance, PPM's or any other concerns relating to services we provide to you then please do not hesitate to contact us.