The London Borough of Waltham Forest

Legionella Policy, Practices & Procedures for Operational, Non-Housing Properties & Community Schools.
Issue date January 2015.

1.0 Introduction

1.01 Background. The purpose of this guidance is to give premises managers and those responsible for buildings regarding the control of Legionella bacteria in water systems. It is necessary to implement controls where there is a foreseeable risk of exposure to potentially contaminated water. Those responsible for the day to day management of buildings have a duty to ensure that this guidance is implemented and that personnel responsible for carrying out the control measures have the necessary training and competence; where the above expertise is not possessed by staff, it may be necessary to enlist the help of appropriate competent contractors and property advisors.

1.02 Investigations into the outbreaks by the Health and Safety Executive (HSE) concluded that whilst the bacteria is ubiquitous, proliferation of the bacteria to the point where an outbreak is likely to occur is avoidable by good management and maintenance of the building services and that outbreaks are usually due to a

breakdown of good management systems. The HSE developed and published an Approved Code of Practice called ' HSE L8 - The Control of Legionella Bacteria in Water Systems', recently augmented by BS8580:2010 Water Quality- Risk Assessment for Legionella Control; these documents have special legal status in that the management of any premises must be able to demonstrate that they are following or bettering these recommendations.
The Council have Duty of Care obligations under the Health and Safety at Work Act 1974 to their staff, premises users and the public to ensure their health, safety and welfare insofar as is reasonably practicable.

1.03 What is Legionnaires' Disease? Legionnaires' disease is a potentially fatal form of pneumonia which can affect anybody, but those who are more susceptible are those aged above 50, people with chronic illness, or those who have suppressed immune systems, and smoke, etc. Most community acquired Legionellosis is caused by the bacterium *Legionella* Pneumophila; however other related Legionellae may cause Legionaries disease.

1.04 What are the possible routes of infection? *Legionella* bacteria occur naturally in the environment in locations such as rivers, lakes, and reservoirs, but man-made water systems provide ideal conditions for growth. Within Waltham Forest Council buildings Legionella bacteria may be found in:
• Hot and cold water systems
• Aerosols may be formed in showers (especially shower heads)
• Whirlpool or hydrotherapy pools
• Some humidifiers
• Nebulisers
• Air scrubbers
• Recreational fountains with fine sprays in buildings
• Jet washes
• Hose pipes
• Irrigation systems
The most likely route for infection is by direct inhalation of bacteria in aerosols (airborne water droplets). Wet cooling towers have been responsible for a number of outbreaks in recent years however the air no known installations in the Councils corporate building stock.

1.05 In what conditions does Legionella thrive?
The optimum temperature at which the bacteria will multiply is between 37ºC and 45ºC, but any system between 20ºC and 50ºC is a potential risk system. The bacteria will survive at higher temperatures, but the survival rate decreases from a matter of hours at 50ºC, to one minute at 60ºC, whilst at 70ºC the organism is killed instantaneously. Below 37ºC the multiplication rate decreases and can be considered to be insignificant below 20ºC however Legionella may still be present and viable. Bacterial growth will be encouraged by water systems suffering from stagnation, scale and corrosion or which contain certain materials that may serve as a source of nutrition to the bacteria. Contaminated water only presents a risk when dispersed into the air as an aerosol, which may then be inhaled. All systems which contain water have the potential to cause aerosols. Services used infrequently should be carefully flushed to replenish water.

1.06 Eliminating the risk. This must be the first consideration in any design or alteration proposal. If the risk cannot be eliminated and alternative options are available and can be provided, then an assessment must be undertaken to ensure that the appropriate solution is used.
Evaporative condensers and water-cooling towers must not be permitted on any of the Council's buildings. Remove stored water where practical and source cold water directly from mains, using point of use heaters, again if practical.

1.07 Reducing and controlling the risk in hot and cold water systems
Where elimination of risk is impractical, the risk should be controlled. It is possible to have very low concentrations of Legionella in many water systems and by careful control it is possible to prevent them from multiplying. Proliferation of *Legionella* may be avoided by:
• Avoidance of water storage temperatures between 20 to 45°C
• Avoidance of water stagnation
• Operating systems safely and keeping them correctly maintained.
• Controlling the release of water spray
• Avoidance of the use of materials that harbour bacteria and other micro-organisms,
or provide nutrients for microbial growth.
• Keeping the system clean to avoid build- up of sediment and bacteria; tanks should be checked regularly to ensure they are clean.
• Use of a water treatment programme
• Ensuring the correct and safe operation and maintenance of the water system ensuring effective water treatment programmes are in place.

2.0 What are the Statutory Obligations to control Legionella

2.01 Health and Safety at Work Act 1974 The Senior Management of the Council have a general employer's duty of care to ensure the health, safety and welfare of their employees, users of the premises and the general public who may be affected by the workplace activity. In this context, legionella outbreaks have been recorded amongst staff, visitors, maintenance workers and members of the public passing by the premises, all who need to be protected by the Senior Management Team.

2.02 Management of Health and Safety at Work Regs: 1992 There is a general requirement for all employers to carry out suitable and sufficient assessments of the risks to the health and safety of their staff and the public from all aspects of the workplace activities. Having identified the risks, there is then an obligation to develop and manage safe systems of work to mitigate the identified risks to provide a safe working environment for their staff and the public.

2.03 HSE Approved Code of Practice L8 and BS8580 identifies that there is a reasonably foreseeable risk of Legionella from cooling towers, evaporative coolers, hot and cold water systems and other water systems operating above 20°C and releasing spray or water droplets. For this document there are no council premises with cooling towers or evaporative coolers and these will not be considered further

but advice is available in HSE L8 / BS8580 if required. All council premises will have hot and cold water systems to consider and premises with hydro-therapy pools, swimming pools or spas will have additional systems to consider.

2.04 Control Of Substances Hazardous to Health (COSHH) Regs 2002 Employers have a duty to identify substances hazardous to the health of their employees and the public through their workplace activities and to institute control measures to minimise the risk so far as is reasonably practicable. Micro-organisms such as Legionella and any chemical that may be considered to manage the risk are covered by the COSHH regulations.

2.05 Water Industry Act:1999, Water Supply (Water Fittings) Regulations 1999, Water Supply (Water Quality) Regulations 2000, BSEN806:2000-2012 Potable Water Systems augmented by BS8558;2012 Water Systems. These documents apply to the design, installation, use and maintenance of any water system connected to the central water infrastructure for the purposes of drinking, washing and cooking. Whilst the primary documents relate only to new installations and repairs, the 2012 issues include an obligation to carry out specific routine inspections and to carry out repairs as necessary to comply with the general requirements. The Water Undertaking also has a duty under the Water Industry Act 1999 to enforce the regulations to prevent undue waste, consumption, misuse or back-contamination of the external mains.

2.06 Health and Safety Commission:2000 ACOP L8, The Control of Legionella Bacteria in Water Systems. BS8580:2010 Water Quality – Risk Assessments for Legionella Control – a Code of Practice. Whilst not regulations or acts of parliament, these documents represent best practice guidance documents developed by the HSE for use by those responsible for managing the risks of Legionella to demonstrate what would be considered as reasonably practicable measures by the courts. Compliance with these ACOPs is therefore considered the minimum standard that should be adopted to manage the risk of legionella in any premises. Whilst this briefing document relays some of the guidance from the ACOPs, it is not an alternative to the ACOPs, copies of which are available for reference.

2.07 Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR). These regulations require employers and others, eg the person who has control of work premises, to report to the HSE accidents, injuries and specified diseases that arise out of, or in connection with workplace activity. Cases of legionellosis are reportable under RIDDOR if a doctor notifies the employer and if the employee's current job involves work on or near cooling systems that use water or hot water service systems in the workplace.

3.0 Roles and Lines of Responsibility

3.01 Waltham Forest Council hold a wide ranging property portfolio with complex lines of management the duty to maintain and implement the *Legionella* policy falls under the remit of the Property Services in the Regeneration & Environment Directorate. The responsible individuals named within this document will implement the control schemes to the duty holder. A summary of roles and named persons are included in Appendix 1 which also indicates changes in responsibilities since 2012.

3.02 Duty Holder Role. The 'Duty Holder' is the named person deemed to hold the statutory duty to manage the risk of legionella in any premises. This person has responsibility to support this policy by ensuring the allocation of resources including adequate budget, suitable and sufficient personnel, time and training. In particular they will

- Eliminate risk where possible
- Appoint appropriate, responsible persons to oversee, control and co-ordinate the control of the risk of legionellosis
- Ensure that there are adequate resources available to control the risk of legionellosis.

The Duty Holder is the Chief Executive of the Council, Mr Martin Esom. Accountability cannot be delegated without delegation of appropriate funds and without ensuring that the statutory duties are being competently discharged.

3.03 The Responsible Person. The Duty Holder must appoint a Responsible Person to manage and supervise the risk of Legionella. The Responsible Person must be professionally qualified, trained and experienced in carrying out these duties in a competent fashion. The Duty Holder shall ensure that the training needs of the Responsible Person are assessed, arranged and attended by the Responsible Person; this assessment, the attendance and the dates for the necessary refresher courses shall be recorded. The Responsible Person role can be shared with a 3rd Party, a technical specialist demonstrated to be competent and experienced in these duties to the satisfaction of the Duty Holder.

3.04 The Responsible Person has the overriding authority for the control of Legionella and has been given this authority by the Duty Holder. The position carries with it the authority to put into effect such measures as are required to control the risk of legionellosis, both as a matter of routine and in the event of a crisis. The Responsible Person has a duty to ensure that all relevant legislation associated with the management and control of legionellosis are adhered to. They have the authority to instruct and enforce where necessary the 'Jointly Accountable Responsible Person' to ensure that all Waltham Forest Council sites meet the requirements of Legislation and this policy. The 'Responsible Person' is required to ensure that 'Jointly Accountable Responsible Persons' are trained and competent to carry out the prescribed task on their behalf and to ensure that the 'Responsible Persons' tasks and requirements are duly met.

3.05 The Responsible Person shall have prepared and maintain a Water Management Log Book (Typically an A4 Ring Binder titled 'Water Management Log Book') all as defined in BS8580:2010 containing:-

- The details of the current Duty Holder (Record past Duty Holders and dates to ensure an audit trail exists)
- The details of the Responsible Person(s) and their credentials. (Record past Responsible Persons and dates to ensure an audit trail exists).

- Up to date drawings, schematics and descriptions of the water systems, their control, maintenance and operation.
- Risk assessment to identify where lower temperature hot water mixing is essential to avoid scalding young children or vulnerable adults.
- The Legionella Water Risk Assessment (WRA) and the statutory 2-yearly remedial progress review.
- The prioritised control measures and remedial works identified from the WRA and identification of those appointed to carry out and when it is planned to happen.
- Training programmes for appointed persons, training attendance records and future training / refresher plans.
- Record maintenance and proliferation control activities, signed and dated by operative responsible for the work.
- Record remedial works, sign and date work completed.
- Keep 2 years of live data in the log book and archive for 5 years to present evidence or procedures if required.
- Annual audits of the Legionella risk management process against the risk management plan and adjust the process as necessary. Record the audit in the Log Book and provide a copy to the Duty Holder.
- The Responsible Person(s) shall commission a Competent Person i.e. someone trained and experienced in the preparation of legionella water risk assessments to carry out formal legionella risk assessments for the premises.

3.06 New, well-designed buildings will normally have little that needs modification but older buildings with older water systems that have been modified over time will commonly have a package of remedial works that are required to reduce the risks of a legionella outbreak. The Responsible Person(s) shall be responsible for prioritising these works and getting the most urgent works carried out without delay or get the affected systems shut down as an alternative method of controlling the risk.

The WRA will also identify 'sentinel' points on the system, these are reference outlets - taps and other outlets that are typically at the extremities of the system that are hardest to keep within the control limits and these should be checked regularly as a proxy for the system as a whole on the assumption that if these sentinel points are at an appropriate temperature then the rest of the system should be at appropriate temperatures.

The Responsible Person shall set up a monthly temperature monitoring regime of the sentinel points identified by the WRA. The names of those appointed to be responsible for this monitoring shall be set out in the log book and records of the activity shall be signed and dated by those appointed to do the tests.

3.07 The Responsible Persons for the control of Legionella within Waltham Forest Councils operational property portfolio is the Assistant Director of Asset Management and Delivery Marina Dimopoulou

3.08 For all premises where the maintenance budget is ***not*** controlled centrally by Property Services of the Environment and Regeneration Directorate, an example would be a Community School which has a devolved maintenance budget, Here the

Responsible person then becomes the Headteacher of the school as they are deemed to be the person in control of the premises.

4.0 Responsible Manager. The Responsible Persons have chosen to appoint a 'Responsible Manager'. The Responsible Manager has been given their authority by the Responsible Persons' to act on their behalf to oversee the day-to-day management of Legionella control for the Council, designated by the 'Responsible Person'. The 'Responsible Person' is required to ensure that the 'Responsible Manager' is trained and competent to carry out the prescribed task on their behalf and to ensure that the 'Responsible Person' tasks and requirements are duly met.

4.01 Responsible Manager also has the responsibility to ensure records are kept to confirm that this policy has been implemented. They have the responsibility for the day-to-day management including ensuring that the scheme of precautions to control the risk of legionellosis is implemented fully by competent persons, whether directly employed by Waltham Forest Council, contracted or subcontracted.

In particular they will:

- Oversee the control and management of legionellosis on behalf of the Duty Holder.
- Ensure that legionellosis risk assessments are carried out on behalf of the Duty Holder.
- Eliminate risk where reasonably practicable.
- Control risk where elimination is not reasonably practicable, by devising and implementing a scheme of precautions.
- Arrange maintenance, monitoring and management of the precautions controlling the risk, including reviewing the risk assessment if there has been any material change and at intervals not exceeding two years.
- Arrange the procurement of competent help, as required, including ensuring that the organisations and individuals deployed are competent and appropriately trained and experienced.
- Keep records.
- Manage the duties in respect to the implementation and management of this policy.

4.02 The Responsible Manager for the control of Legionella within Waltham Forest Councils operational property portfolio is the Compliance, Contracts and Premises Manager.

4.03 For all premises where the maintenance budget is ***not*** controlled centrally by Property Services of the Environment and Regeneration Directorate such as a Community School the headteacher can nominate a person from their senior management team such as bursar or office manager.

5.0 Water Treatment Service Provider. The maintenance and monitoring activities shall be identified by the Responsible Person and the names of those appointed to

carry out these activities shall be entered in the Log Book. The maintenance, de-scaling and monitoring works shall be recorded, signed and dated by those appointed to do the tests.

5.01 The Water Risk Assessments and Review activity shall be identified and appointed by the Responsible Person and the names of those appointed to carry out these activities shall be entered in the Log Book. The Risk Assessment and Reviews shall be prepared, signed and dated by those appointed to do the tests.
The recommended remedial works, if any, identified by the Water Risk Assessment shall be identified, prioritised and carried out by the Responsible Person via an appropriate appointment. Appointed persons shall be trained and experienced in the duties allocated to them and the training needs shall be identified, arranged and records of attendance kept by the Responsible Person.

5.02 The water treatment service provider for the Council is with the Aston Group who have appointed specialists subcontractor Housemans. For Community Schools they make their own arrangements as part of their buy back services with professional consultants NPLS or other Providers.

6.0 The Responsible Person Role (Technical) The London Borough of Waltham LBWF Asset Management have appointed NPS London Ltd, their joint venture service partner to share the Responsible Person role to provide technical advice as follows:-

- Develop the Legionella Management Plans for issue to the Council and their Post Holders as guidance on how to proceed.
- Offer 'Responsible Person' professional services to Post Holders who do not have the requisite skills and experience within their professional team.
- Negotiate with the preferred Legionella Water Risk Assessment Specialists and make available to Council Premises via the Legionella Management Term Contract and the Mechanical Services Term Contract facilities for:-
- Legionella Water Risk Assessments (WRAs)
- Legionella Water Risk Assessment Reviews
- Advice from monthly temperature monitoring to the Councils corporate buildings.
- Preparation of quotations for the consequential remedial works identified by these risk assessments and monitoring checks.
- Preparation of quotations for routine de-scaling, flushing and other routine maintenance works where not carried out by the premises staff.

6.01 NPS London Ltd. have also offered their professional services to audit all premises legionella management systems Log Books on behalf of the Council to ensure:-

- An appropriate Duty Holder has been named and recorded in the Log Book.
- Appropriate Responsible Persons (Financial and Managerial) and (Technical) have been named and recorded in the Log Book.
- The Log Book has been prepared and maintained up to date on site and labelled Water Management Log Book
- The Log Book contains a Written Scheme for the management of legionella in the premises' water systems.

- The Legionella Water Risk Assessment (WRA) has been commissioned from a competent member of the Legionella Control Association. The WRA should be kept in the Log Book.
- Dates for the next Water Risk Assessment and Review are stated.
- Remedial works identified in the Risk Assessments are prioritised in terms of their imminent risk and that an appropriate remedial action plan is in place to get the risk control measures enacted as soon as possible.
- Suitably trained operatives are employed to carry out monthly monitoring of water outlet temperatures and that the cause of any out-of-range temperatures is investigated and corrected as soon as possible.
- Essential water systems maintenance work is identified and carried out and that records are kept in the Log Book to demonstrate this.
- Two years of records of remedial works and routine monitoring, signed and dated by those responsible for the works are kept in the Log Book. Up to five years records should be retained separately.
- A green (pass), amber (needs updating) and red (needs significant attention) Log Book rating would be utilised.

7.0 Water Services Design

7.01 Cold water systems should be designed to remain below 20°C throughout from intake to use. In the UK, water typically enters the building at 10°C and should be well insulated throughout to keep the temperature rise to less than 10°C. The tank should be sealed to exclude insects etc. and be well insulated and sized to 'turn over' the contents once every 24 hours to minimise the temperature gain. If the tank is over-sized for any reason, the water can sit in the tank much longer leading to stagnation and bacterial growth. All connected water fittings should generally be regularly used to prevent 'dead-legs' i.e. sections of little-used or un-used pipework where the temperature can rise above 20°C leading to bacteria proliferation. Completely un-used sections known as 'dead-ends' should be removed back to the nearest live connection point and be no more than 2x pipe diameters long.

7.02 Hot water systems should be designed to store water at 60°C circulate it around the building to return at 50°C although this delivers water potentially too hot for young children, elderly or infirm . Thermostatic mixers on basins and showers can deliver safe temperatures for these user but the amount of water allowed at 43°C must be strictly limited to a short length of pipe to minimise the opportunity for bacteria to proliferate. BSEN806 limits this to 1.5 litres of water which equates to 3m of 15mm pipe.

8.0 Legionella Risk Assessments

8.01 Legionella risk assessments should be carried out in accordance with the BS 8580:2010 Water Quality Risk Assessments for Legionella Control. The simple rules of thumb to maintain good water quality is to keep the hot water hot and the cold water cold, keep it clean and keep it moving. The purpose of the legionella risk assessment is to inspect each element of the water system to identify locations

where these simple control measures might be compromised and to develop a strategy to remedy this situation without delay. Tanks would be checked for signs of being over-sized and for missing or damaged physical protection to keep insects and vermin out of the tank. Temperatures should be checked to ensure that the normal temperature profile (<20°C) is maintained.
Central hot water plant would be checked for normal operation delivering hot water flow and return temperatures of 60°C and 50°C respectively and for the hot water vessel and hot water system to be pasteurised at 60°C periodically.
The pipework systems would be inspected for dead-legs where fittings have been removed or fallen into disuse providing a location for the legionella bacteria to proliferate. Pipework insulation would be checked to ensure that the cold mains remain cold and the hot mains remain hot.
Final connections to fittings should be relatively short so that the correct temperature water arrives relatively quickly, hot water should arrive at 50°C or more within 1 minute and cold water should arrive at 20°C or less within 2 minutes. Critical locations around the water system are identified as 'Sentinel' locations, selected to represent the system as a whole. These sentinel temperature locations are identified for monthly monitoring tests to represent the status of the system as a whole; if the sentinel temperatures are safe then the system as a whole should be safe.

8.02 The Water Risk Assessment identifies the stages leading up to Legionella outbreak as;-

- Initial System Contamination (Assumed this will happen)
- Amplification (Conditions to encourage proliferation)
- Transmission (Generation of spray or droplets)
- Exposure (Inhalation by vulnerable people)

The purpose of the legionella risk assessment is to inspect each element of the exposure process to identify situations where the control measures might be compromised and to develop a strategy to remediate this situation. The remedial works are prioritised to ensure that the available funds are targeted at the most immediate danger i.e. Priority 1 works directly impact the imminent risk of Legionella and should be remedied as soon as possible whilst Priority 2 works represent deficiencies against best practice.

8.03 The relative safety of the water system as a result of the monthly tests would be colour coded i.e.
Green – All measured temperatures are within safe range
Amber – Marginal failure should be investigated
Red – At least one temperature out of safe range
Utilisation is a significant factor, little-used WCs or showers that are still needed periodically and therefore cannot reasonably be decommissioned need to be regularly flushed through for 5 minutes weekly to prevent the pipelines being used as a breeding area by the bacteria and this flushing becomes part of the written management procedure.

9.0 Legionella Testing and Sterilisation

9.01 As legionella bacteria is expected to be present in small quantities in any water system, testing in not normally required unless there is a bad taste, discolouration or signs of other contamination.

9.02 Where a system has been contaminated, left empty for a period or significantly modified sterilisation is recommended by BSEN806 by chlorination of cold water systems and / or pasteurisation of hot water systems as appropriate.
More significantly, suspected contamination is a sign that the normal design principles and temperature-based legionella control process has failed to protect the system from contamination and needs to be reviewed. A new Legionella Water Risk Assessment therefore needs to be carried out without delay to identify why the protection failed and what remedial action is necessary to reinstate the protection.

9.03 The HSE L8 gives advice on water treatment techniques to control bacterial growth, the techniques all have significant operational problems and it is unusual to find such systems in Council premises. If contamination is suspected, samples should be taken for testing without delay and high risk activities such as showers taken out of service until the matter is resolved. The system should be disinfected by chlorination and/or pasteurisation depending on the circumstances. There should be a new Water Risk Assessment carried out to identify the reason for the suspected contamination and the recommendations carried out as soon as possible. Until such time that the source of the contamination has been identified and remediated the system is at risk and should be re-tested for Legionella regularly.

9.04 To conclude the key Risk Management Activities undertaken to maintain healthy water systems are;

5 yearly – Full Legionella Water Risk Assessment
2 yearly (mid-term) Review of Water Risk Assessment
Annually check cold tanks for contamination
Annually remove scale from calorifiers
Annually check all outlet temperature to be:
>50°C after 1 minute
<20°C after 2 minutes
6-monthly check incoming mains water temperature
Quarterly disconnect and de-scale shower heads
Monthly check calorifier flow and return temperatures
Monthly check sentinel outlet temperatures
>50°C after 1 minute
<20°C after 2 minutes
Weekly flush little-used showers, basins and WCs for several minutes taking care to avoid spray
Daily pasteurise the HWS calorifiers to 60°C

10.0 Policy & Procedure Review.

10.01 This Legionella policy, practices & procedures to operational non housing properties and community schools should be reviewed on an annual basis. This shall be the responsibility of the Responsible Manager, the Contracts & Compliance Manager in consultation with the responsible person, responsible technical person and the Councils Health & Safety Manager. The Council also work together with the Trade Union representatives in accordance with the 1977 Trade Unions Safety Regulations in order to fulfil the requirements of this Policy. This is to ensure that it conforms to current best practice and takes into account any changes of legislation during this period. The annual review date shall be January of each year where the document shall be presented to the Councils Corporate Health & Safety Committee for formal approval and adoption.

Version Control

Document Information

Title	**Water safety**
Document Type	A policy on water safety for Waltham Forest Council
Document summary	This document outlines the responsibilities and systems for managing water hygiene and legionella in Council buildings
Policy Owner	Compliance, Contracts and Premises Manager
Location of original	CSD/Portfolio/Asset Management/Compliance 2015/ Policies and Guidance 2015.

Version History

Revision date	**Summary of changes**
October 2013	agreed by CHSC 3
January 2015	Subject to approval by CHSC
January 2016	For review.

Appendix A:- Roles and Responsibilities

For the purposes of this Legionella Management Plan:-

The Statutory Duty Holder is:- **Chief Executive Mr Martin Esom**

Post Acknowledged: - signature {……..}

Statutory Duty Holder status commenced: - date {……}

Appointed Responsible Person for the **corporate funded** estate is:- **Assistant Director Asset Management & Delivery Marina Dimopoulou**

Appointed Responsible Person for a **Community School** site is the **Headteacher** of the school site.

Post Acknowledged :- signature {……..}

Responsible Person status commenced :- date{ site specific…….}

Appointed Responsible Person (Technical) is:- name {**David Corben, NPS London Ltd**.}

Post Acknowledged :- signature {……**David Corben…**……..}

Responsible Person status commenced :- date{……**August 2013**…….}

The Responsible Manager for the corporate funded estate is the **Compliance, Contracts and Premises Manager**

Post Acknowledged :- signature {……..}

The Responsible Manager commenced :- date{1st August 2013…….}

The Responsible Manager for a **Community School site** is name { TBC……}

Post Acknowledged :- signature {…TBC……..}

The Responsible Manager commenced :- date{TBC…….}

TBC= are site specific names where budgets have been delegated.