

Reopening our retail and hospitality areas safely

April 2021



HM Government



EUROPEAN UNION
European Regional Development Fund



Crawley
Borough Council

[crawley.gov.uk/coronavirus](https://www.crawley.gov.uk/coronavirus)

Introduction

Following the government's announcement that non-essential retail can reopen on 12 April, Crawley Borough Council and its partners are attempting to make the town centre and neighbourhood parades safe for the return of shoppers and staff.

Additionally, outside hospitality can reopen on 12 April, with hospitality and licensed venues allowed to serve food and beverages to people in outside spaces only. This document provides you with details about our plans, as well as guidance and considerations for you to think about to ensure you adhere to the government's latest guidance.

Please remember, you are responsible for your own signage and queuing systems within and outside your shops and hospitality venues. To control the spread of infection, it is vital for businesses that choose to open to follow strict social distancing and hygiene measures. More information is in this document.

The current guidance will change in the future. Any major changes will be incorporated into an updated version of this document.

If you have any questions or feedback regarding the reopening of non-essential retail, please email the [Economic Development team](#). If we don't already have your contact details, please send an email to the [Economic Development team](#); we'll add you to our mailing list and keep you up-to-date with the latest information.

If you have any questions regarding the reopening of hospitality and licensed venues, please email our [Environmental Services team](#). For more coronavirus information for businesses, visit the business support page on our [website](#).

Reopening our retail areas safely in Crawley is a project which is part funded by the European Regional Development Fund. The Government has made use of this fund to support the safe reopening of high streets and other commercial areas across the UK.

Communication

We have developed a communications campaign to support the return of visitors and the next few pages give a flavour of what you can expect to see around the town centre and neighbourhood parades.

The messages – which will appear on signage, floor stickers, the Queens Square digital screen, lamp post banners, social media and more – are designed to provide guidance and reassurance to visitors and workers as they return to our retail areas. For example, where space is limited we are asking to people to travel in a one way direction only; in other areas to travel along different sides of pedestrianised streets to maintain social distance.

We will be reminding visitors to:

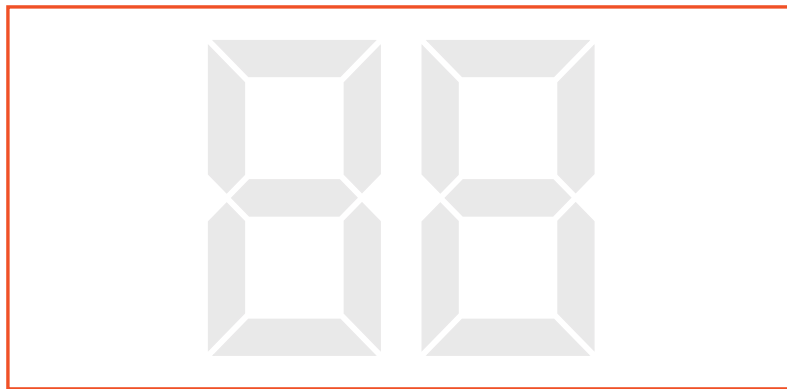
- Follow social distancing guidelines
- Pay by contactless where possible
- Follow directional signage
- Wear face coverings when social distancing isn't possible
- Be considerate and give way where paths are narrow.

We have also included two posters for you to print and display in your windows. One is for you to clearly show the maximum number of people allowed in your premises (page 4) and one to show the maximum number of people in your queue (page 5).



Please maintain
social distancing

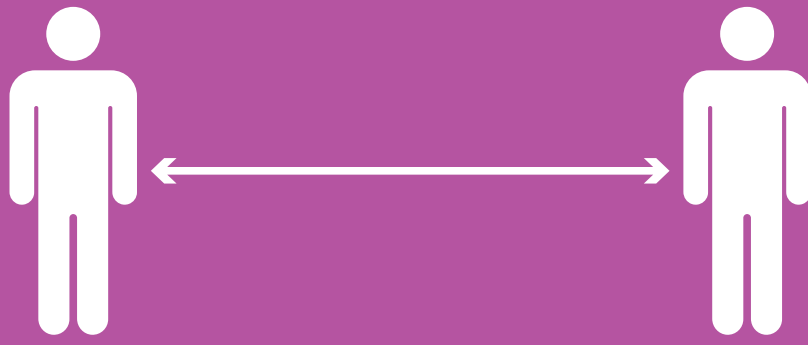
MAXIMUM



**VISITORS IN STORE
AT ANY TIME**

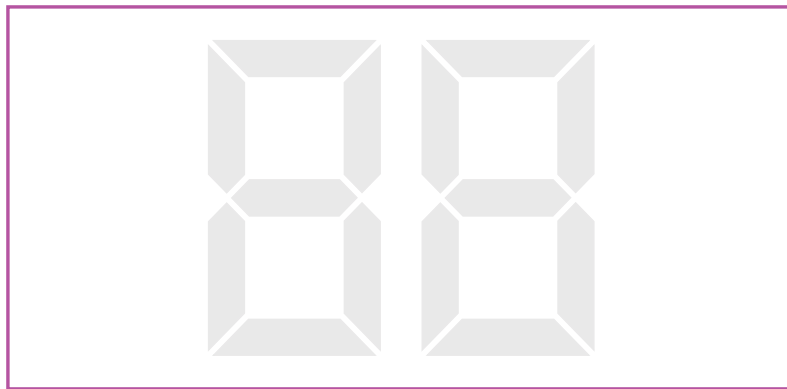


Please print and display in your shop window



Please maintain
social distancing

MAXIMUM



**PEOPLE IN THE
QUEUE AT ANY TIME**



Please print and display in your shop window

Welcome signage

These welcome signs have been produced in different colours to match the place branding in different areas of the town centre.

Welcome to Crawley town centre.
Please help us in keeping everyone safe and observe these guidelines.

 Follow **social distancing**

 Pay by **contactless**

 Follow **one way signs**

 **Sanitise your hands**

 **Be considerate to other people**
and allow them to pass where
footpaths are narrow

 **Wear face coverings** when
social distancing isn't possible

Thank you for shopping locally and supporting Crawley's businesses.
crawley.gov.uk

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Digital screen messages


These messages match those on the welcome signage and will be played on a loop on the Queens Square digital screen.

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Follow social distancing

Thank you for shopping locally and supporting Crawley's businesses.




Welcome to Crawley town centre.
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Pay by contactless

Thank you for shopping locally and supporting Crawley's businesses.




Welcome to Crawley town centre.
Please help us in keeping everyone safe and observe these guidelines.




Follow one way signs

Thank you for shopping locally and supporting Crawley's businesses.




Welcome to Crawley town centre.
Please help us in keeping everyone safe and observe these guidelines.



Sanitise your hands

Thank you for shopping locally and supporting Crawley's businesses.



Welcome to Crawley town centre.
Please help us in keeping everyone safe and observe these guidelines.




Be considerate to other people and allow them to pass where footpaths are narrow

Thank you for shopping locally and supporting Crawley's businesses.




Welcome to Crawley town centre.
Please help us in keeping everyone safe and observe these guidelines.



Wear face coverings when social distancing isn't possible

Thank you for shopping locally and supporting Crawley's businesses.



Lamp post signage

Welcome to Crawley town centre.
Please help us in keeping everyone safe and observe these guidelines.

Follow social distancing

Sanitise your hands

Pay by contactless

Be considerate to others and allow people to pass where footpaths are narrow

Follow one way signs

Wear face coverings when social distancing isn't possible

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Sanitise your hands

Pay by contactless

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Wear face coverings when social distancing isn't possible

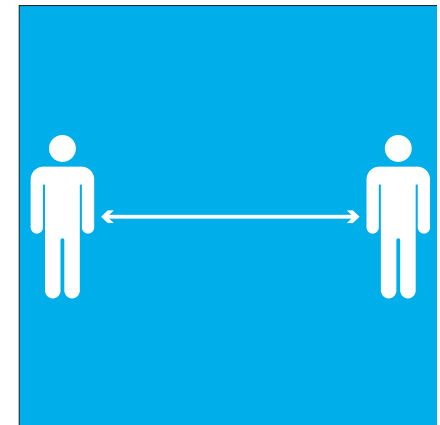
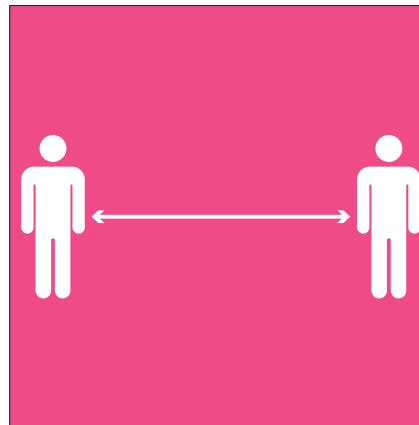
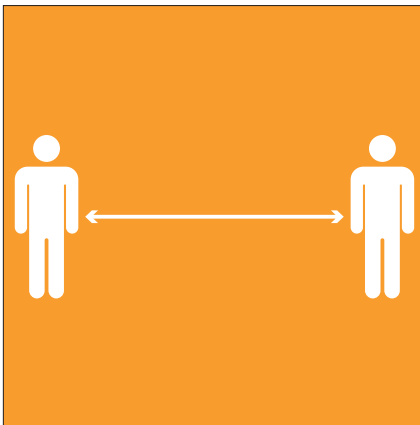
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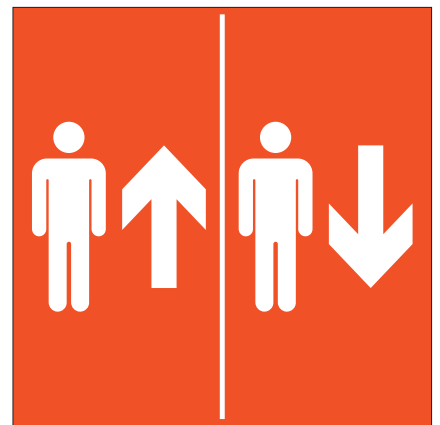
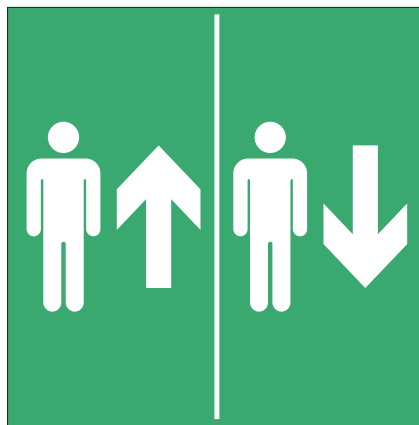
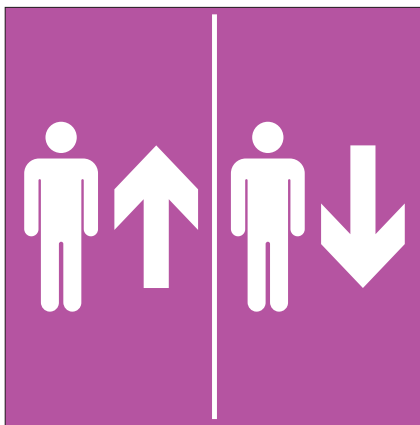
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Maintain social distancing lamp post signage



Two way lamp post signage



Give way lamp post signage



Welcome to Crawley town centre.

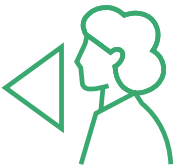
Please help us in keeping everyone safe and observe these guidelines.



Follow **social distancing**



Pay by **contactless**



Follow **one way signs**



Sanitise your hands



Be considerate to other people and allow them to pass where footpaths are narrow



Wear face coverings when social distancing isn't possible

Thank you for shopping locally and supporting Crawley's businesses.

crawley.gov.uk



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Business support

A checklist for reopening.

Retail

- Risk assessment
- Physical distancing
- Signage/communication
- Store layout
- Entry and exit points
- Number of customers inside store
- Customer movement inside store
- Queue management
- PPE provided for staff
- Plastic screens on counters
- Payment methods
- Opening hours
- Stock handling.

Office

- Risk assessment
- Physical distancing
- Signage/communication
- Split staff rota
- Staggered arrival times
- Staggered lunches
- Office layout
- PPE provided or available
- Enhanced cleaning
- Travel
- Meetings
- Who is permitted entry into building?
- Sharing equipment.

Café/restaurant

- Risk assessment
- Physical distancing
- Signage/communication
- Provision of outside dining
- Reduced table number/number of customers
- Queue management
- PPE provided for staff
- Plastic screens on counters
- Enhanced cleaning
- Payment methods
- Use and management of toilets.

More detailed information is on the following pages.

For more information about business support, visit [crawley.gov.uk/business](https://www.crawley.gov.uk/business)

Advice for hospitality and licensed venues

As COVID-19 restrictions begin to ease, hospitality and licensed venues will be allowed to serve food and beverages to people in outside spaces only. There will be no need for customers to order a substantial meal with alcoholic drinks and no curfew imposed, although customers must order, eat and drink while seated (table service by way of waiter/ess service only).

Wider social distancing and contact rules will apply in all these settings to prevent indoor mixing between different households. For example, when a customer leaves the outside table to go inside to use the toilet facilities, they must wear a face covering. We will continue to work with businesses to ensure that operations are COVID-19 compliant.

Preparing your business to fully reopen

This means that your business will have a number of preparations and things to consider in advance of opening for full business. We recommend that you thoroughly read through the government guidance by clicking on the following: ‘Keeping workers and customers safe during COVID-19 in restaurants, pubs, bars and takeaway services’ as this provides useful advice and includes checklists which you can use. Please be advised that this guidance is regularly updated and therefore important that you regularly check and read through this guidance.

In addition, the Food Standards Agency has created an “Opening checklist” which you can use to ensure your licensed premises and/or food business is opened safely. Please see Appendix A. Crawley Borough Council is aware that some premises are already operating as a takeaway only. However, it is important that as a responsible operator, you consider all the additional risks presented when the premises fully reopens for business.

Pest control

The council would like to highlight to businesses that have been shut for a long period of time during lockdown with no or little activity, that such a premises may be more susceptible to pest infestation. A premises that has been closed is an ideal condition for pests including rats. Therefore, it is essential a thorough check for such is completed, as well as a full deep clean before opening. If you notice any issues, you are advised to contact your pest control contractor, or contact the council to be referred to the council's own pest control services.

Other risks

Legionella is a harmful bacteria which can cause respiratory illness. When water is left to stagnate there is a greater risk of increased bacteria. As a responsible operator, you must take reasonable steps to ensure the safety of the premises water system prior to opening.

Guidance on how you could do this can be found in Appendix B. It should be noted that this is just generic guidance, and businesses must ensure actions are taken which are appropriate to the type of water system used.

Allergen control

Businesses need to consider allergen control, particularly where suppliers or ingredients may have changed. Allergens may be different and it is important to review your ingredients to ensure the correct allergen information is provided to your customers.

It is key that businesses read and understand the latest government guidance and review risk assessment in place for the business, both generally and in regards to COVID-19, taking steps to implement the appropriate control measures.

Licensing compliance

For those businesses which have a premises licence issued under the Licensing Act 2003, you will need to ensure that you comply with any relevant licence conditions and look to promote the Licensing Objectives. There are some relaxations around off sales from premises by virtue of the Business and Planning Act 2020, but businesses need to ensure that the appropriate controls are in place to ensure the effective control and supervision of premises: staff training, robust cleansing and cleaning practices, use of Door Supervision, and meeting the requirements of Stage 2 of the Government measures in relation to COVID-19.

Businesses with outside areas will also need to review any Noise Management Plan, and take steps to minimise the levels of noise and nuisance externally. The council does not support music or entertainment in external areas where it is likely to disturb other businesses or residents in the vicinity.

Pavement licences

Premises licensed for the sale of alcohol can apply for a pavement licence, issued by Crawley Borough Council, which allows removable furniture to be placed on the highway and over pavement areas adjacent to the premises. This licence is valid until 30 September 2021. Businesses can apply for pavement licences in time for 12 April 2021 via the [pavement licences page](#) on our website.

Health and Safety

The Health and Safety at Work Act 1974 requires that workplaces provide training for staff to ensure health and safety procedures are understood and adhered to. A safe working environment that is properly maintained and where operations within it are conducted safely is also key. Before opening, businesses need to review and update risk assessment and working practices to ensure the health and safety of staff and customers using your business. Please see guidance from HSE published on the [working safely pages](#) on the HSE website.

Grants and business support

A range of business grants remain available to premises who have faced financial loss as a result of the COVID-19 pandemic. Details of how to access these can be found on the business support grants page on our [website](#).

The Council is keen to support businesses as lockdown eases and operations re-commence. Please do not hesitate to contact the relevant Department if you have any queries or concerns.

For more information, please contact [Environmental Services](#).

Business support

Guidance and advice

Key points

Advice/guidance

Risk assessment

A coronavirus risk assessment is a legal requirement. Please visit the [HSE website](#) for guidance on workplace risk assessments.

Staff wellbeing

Staff should be trained and aware of new regulations and guidance that your business puts in place. These may include:

- Personal hygiene guidance and assurance on what personal protection equipment (PPE) will be provided for staff
- New rules around the cleaning of surfaces, products, and payment methods
- Recommendations of the safest ways to travel to and from work e.g. taxi allowances, guides to safe walking/cycling routes or flexible hours to avoid limited capacity on public transport
- Recommendations for staff wellbeing during working hours and break times, such as promoting open spaces and parks near your business
- Video comms is a simple way of communicating this to your team.

PPE

If your staff are customer-facing, personal protective equipment (PPE) should be made available.

Consider what the correct PPE is. The Government provides information on its [working safely pages](#):

Examples of PPE:

- Disposable face masks provided
- Gloves
- Hand sanitiser
- Screens between desks/tables and at till points.

Business support

Guidance and advice

Key points

Advice/guidance

Enhanced cleaning

Enhanced cleaning regimes might include:

- More frequent cleaning
- Periodic deep-cleaning, where appropriate e.g. between team shift changes etc.
- Communicate cleaning processes to reassure staff and customers
- Cleaning between each customer e.g. chairs, tables, condiments etc.
- Enhanced and more frequent cleaning of doors/handles/toilets
- Provision of disposable hand towels rather than hand dryers
- Messaging to promote good hygiene e.g. frequent handwashing.

Layout

Consider the layout of your premises. Think about:

- One way routes
- How entry and exits points can be different
- Maximum number of persons permitted in the premises at any one time
- Room sizes and how social distancing guidelines can be adhered to
- Rotation of staff who are in the office at any one time e.g. splitting staff into teams, creating a rota with no overlap etc.
- Where an isolation area can be made available
- Whether any areas should be closed e.g. kitchens, canteens etc.
- Limiting meetings and, where possible, using other means of engagement
- Outside dining and working provision for staff as well as minimising risk of people dining together inside.

Business support

Guidance and advice

Key points

Advice/guidance

Signage

Messages need to be clear, consistent and available for staff and customers. Signage should include:

- Social distancing
- Hand washing (for 20 seconds with soap and water, or hand sanitiser)
- Limits to the number of customers inside store at any one time
- Contactless payment methods wherever possible.

Social distancing

This could include:

- Floor markers to indicate safe distance
- Notices to be clear and in obvious places e.g. at entrance points, queuing areas, till points etc.
- Appropriate changes to floor layouts to facilitate safe distancing
- Desk positions, size of rooms, screens, hallways etc. will need to be considered
- Limiting the number of staff by splitting shifts, staggering arrival/departure/lunch breaks etc.
- Use of outdoor spaces should take into account the layout of the areas, positioning of tables and chairs, sneeze screens between tables
- Remove all unnecessary obstacles.

Opening hours

Changes to your 'normal' hours should be considered. Any changes need to be communicated to staff and customers.

Business support

Guidance and advice

Key points

Advice/guidance

Queue management

- At times queues will form. You must ensure that they are managed responsibly with social distancing maintained. Numbers of people in the queue at any one time must be restricted. Areas for queueing should be clearly marked. Consider an appointment system at busy periods. Work with neighbouring premises to plan your queue
- Look after people in your queue, especially in hot or wet weather. Let them know likely waiting times.

Payment methods

Promote contactless methods of payment and think about removing cash as a payment option.

Changes to payment methods should be communicated to customers and staff. Clear signage will help with this.

Appendix A

Reopening checklist for food businesses during COVID-19

Planning and preparation for start-up

Check	Completed	Date
Check your Local Authority is informed of current food activities		
Notify your Local Authority of your intention to restart operations .		
Notify your Local Authority of any change to the business activities you are registered for. This includes the introduction of any new delivery or takeaway service.		
Update your Food Safety Management System for any new procedures		
Consider any risks to food safety introduced by changes to procedures.		
Review and document new procedures in relation to takeaway or delivery services e.g. allergen management, cook-chill-reheat, temperature control awaiting collection or during delivery.		
Manage risks of cross-contamination between raw and ready-to-eat foods.		
Ensure food packaging for takeaways and delivery is food grade, and appropriate for the purpose and food type.		
Store food packaging hygienically. Check that the hygiene and integrity of any packaging stored through a period of closure has been maintained and dispose of unsuitable packaging.		
Check staff are fit for work and wearing clean work clothes.		

Check	Completed	Date
Consider adjustments to fitness for work procedures to take account of COVID-19 symptoms . Initial telephone interviews with staff may be beneficial in assessing fitness to work.		
Review the government advice on use of Personal Protective Equipment (PPE) outside of medical and care settings. Working safely during coronavirus (COVID-19) has further guidance for restaurants offering takeaway or delivery.		
If your business requires staff to wear PPE, check you have adequate stocks available.		
Review any PPE laundering procedures, where appropriate, to ensure PPE worn by staff can be safely changed and cleaned regularly.		
Ensure any changes to procedures are communicated to staff and training is provided where appropriate, including training of any new staff.		
Check registered waste carrier services		
Ensure that your registered waste carrier services are running and available as required, to ensure there is no build-up of waste on site.		

Site checks

Check	Completed	Date
Check food preparation areas are clean and disinfected (this includes work surfaces, equipment and utensils)		
Carry-out a full site assessment to determine if you can undertake a thorough clean or if a professional deep clean is needed.		
Source suitable cleaning and disinfection consumables and check existing stocks are within their use-by date. Cleaning products made-up or diluted before any closure should be disposed of as effectiveness reduces over time. See our guidance on cleaning if your regular cleaning products are not available .		
Assess if staff need re-training on dilution rates and cleaning procedures.		
Increase frequency of cleaning and disinfection, paying particular attention to shared equipment and high through-put and touch areas.		
Check all areas are free from evidence of pest activity		
Look for evidence of pests, and take action if necessary, before restarting your operations. Check for: <ul style="list-style-type: none"> • signs of damage or smearing to walls and doors • gnawed or stained packaging • footprints in dust • animal droppings or urine smell • insect bodies, larvae, cocoons and egg/pupal casings • feathers. 		
Consider resetting your pest-control schedule if necessary.		

Check	Completed	Date
Arrange for contractors to undertake a pre-opening site survey, if required.		
Check handwashing and cleaning materials' availability (this includes soap, sanitiser and paper towels)		
Make sure all consumables are within dates for use.		
Obtain enough of your regular cleaning consumables such as soap, sanitiser and paper towels. Provide suitable alternatives if your regular products are unavailable.		
Consider updating staff training in line with government advice that staff should wash their hands more frequently than usual . This should be for 20 seconds with warm water and soap.		
Check hot and cold running water is available at all sinks and hand wash basins.		
Make sure adequate hand-washing stations are provided at all appropriate points within the food production and communal areas.		
Consider providing hand sanitiser additional to hand-washing facilities at appropriate locations.		

Equipment checks

Check	Completed	Date
Check your fridges, chilled display equipment and freezers are working properly		
Thoroughly clean equipment before restarting and restocking.		
Check required temperatures and any temperature control records, if kept during closure period.		
Review whether equipment requires maintenance after a period of inaction.		

Check	Completed	Date
Allow sufficient time for equipment to reach required temperature before restocking.		
Remove and refresh any ice left in machines and dispensers.		
Check your other equipment (e.g. oven) is working properly		
Thoroughly clean all equipment before reopening.		
Inspect for maintenance requirements, verify temperatures and re-calibrate where necessary for time or temperature.		
Run dishwashers and glasswashers empty on hot cycle before use.		
Flush through taps and other equipment with water systems (e.g. bain marie).		
Consider Legionella risks and take action in line with Legionella guidance from the Health and Safety Executive to reduce risks.		
Check probe thermometer is working properly, and probe wipes are available		
Consider whether probe thermometers need to be recalibrated.		

Ingredient and product checks

Check	Completed	Date
Check raw materials and ingredients		
Check for any damage to packaging which might affect safety of food or result in loss of allergen information.		
Check for any evidence of temperature abuse which may render the food unsafe. Refer to temperature control records where available.		

Check	Completed	Date
<p>Check the use-by and best before dates on existing stock. Ensure that storage has been in-line with manufacturer's instructions. For example, check that any opened or unsealed product has been stored in line with labelled instruction such as 'Once opened consume within'.</p>		
<p>For foods frozen by you on closure, check that labelling and records are sufficient to allow the safe use of the food.</p>		
<p>Check that the length of storage is in-line with your assessment at point of freezing.</p>		
<p>Check that you can obtain your usual raw materials and ingredients so that your product specifications can be met.</p>		
<p>Ensure that any new suppliers are reputable and can meet your requirements. Safer food, better business guidance is available on the selection of suppliers and contractors.</p>		
<p>Check allergen information is accurate and available for all items on sale</p>		
<p>Review your allergen management system, allergen matrices and menus to account for changes of supplier and any new raw materials or products.</p>		
<p>Review new takeaway or delivery services to ensure risk of allergen cross-contamination is managed.</p>		
<p>Ensure allergen information is available to customers at time of ordering and at delivery of food.</p>		

Social distancing measures

Check	Completed	Date
Review the government advice on social distancing in the workplace in Working safely during coronavirus (COVID-19) .		
Provide where possible for 2 metre social distancing. See Social distancing at work and Food preparation .		
Consider steps to minimise staff-customer interactions. See Managing your customers, visitors and contractors .		
Consider how you will communicate with, update and where necessary train staff in new procedures. See Communications and training .		
Identify staff at higher risk. See Protecting people at higher risk .		
Cohort working teams to lower staff mixing. See Workforce management .		
Increase ventilation. You should assess the possibility to do this without introducing new risks or hazards to food safety and hygiene. See Before reopening .		
Refer to government guidance on social distancing, customer interaction and communication or instructions to the public .		

Appendix B

Legionnaires' disease: lockdown risks and reopening safely



When buildings reopen after lockdown, it is essential that water systems are not put back into use without considering the risks of Legionnaires' disease. There is an increased risk of waterborne pathogens such as Legionella bacteria being present as a consequence of the conditions that lockdown may have created.

As a result of the **coronavirus (COVID-19)** pandemic, there is the potential for an increased number of people to be susceptible to Legionnaires' disease due to a compromised respiratory system during or after infection with COVID-19.

Scope

Legionnaires' disease is a type of pneumonia which can cause serious respiratory illness. It can occur when tiny droplets of water (aerosol) containing Legionella bacteria are breathed into the lungs of susceptible people. Preventing Legionnaires' disease is typically achieved by limiting the growth of Legionella in building water systems.

Legionella bacteria will inevitably enter man-made water systems and the degree of risk it poses will vary. All hot and cold water systems need to be considered, including those at: retail outlets; hairdressers; beauty salons; offices; hotels; gyms; sports clubs; golf clubs; hotels; pubs; clubs; restaurants; camp sites; volunteer-run premises and anywhere that has a water supply which is currently shut down or is experiencing restricted use.

Smaller hot and cold water systems are generally lower risk than more complicated ones and this guidance aims to assist those with such systems in controlling the risk of Legionnaires' disease and reopening safely when it is appropriate to do so. It is provided on the basis that organisations will already have suitable control measures in place.

Separate guidance is available for specialist water systems such as swimming pools, spa pools and buildings where water systems are more complex. These should already be subject to more detailed arrangements and control measures. Owners and operators are advised to seek advice from a competent water treatment consultant.

Legionella risk factors

Factors that give rise to Legionella risk are already described in existing guidance document [HSG274 Part 2 – The Control of Legionella Bacteria in Hot and Cold Water Systems](#). During this pandemic and

subsequent lockdown, there are two risk factors that may have increased within your organisation, creating ideal conditions for Legionella bacteria to grow in your water system. These are temperature and time for stagnation to occur.

Legionella bacteria thrive at temperatures between **20°C and 50°C** so one of the key control measures for minimising the risk is to ensure that your cold water is cold (i.e. below **20°C**) and the hot water is hot (above **50°C**). When water is below 20°C or above 50°C Legionella bacteria will not grow. However, water between these temperatures presents a greater degree of risk, particularly where it is left to stagnate. Generally, where water is left within a system without movement for more than a week then the risk of growth will increase.

The legal requirements

Under health and safety law, employers, business owners and landlords must manage the risks of exposure to Legionella bacteria. Owners and operators of water systems have a duty to keep them safe to protect the health and safety of employees and visitors. This is true at all times but especially where buildings are closed, subject to low use or reopening. This requires a suitable and sufficient assessment of that risk. Guidance on how to do this is provided in these Health and Safety Executive (HSE) documents: [L8 Approved Code of Practice and guidance on regulations](#) and [HSG274 Part 2 – The Control of Legionella Bacteria in Hot and Cold Water Systems](#).

Risk from this hazard is foreseeable in nearly all hot and cold water systems and a scheme of control should be in place to address that risk which will typically include checking water temperatures, programmed maintenance/checks and flushing parts of the system that may contain stagnant water due to low use. Where the risks within the water system change, the risk assessment must be reviewed and revised as necessary

to address those changes. The significant findings of any review should be recorded, but this may only need to be a simple written description of the extra measures being taken at this time.

The European Society of Clinical Microbiology and Infectious Diseases (ESGLI) has produced this useful [Guidance for managing Legionella in building water systems during the COVID-19 pandemic](#). This guidance states that the closure of buildings, parts of buildings or their restricted use, can increase the risk of Legionella growth in water systems and associated equipment if they are not adequately managed.

Key lockdown risk factors and control measures

A combination of warm external temperatures and low use of water systems may have given rise to an increased risk of conditions in which Legionella bacteria can grow.

Ideally, changes in Legionella risk will have been considered at an early point in planning lockdown arrangements. However, if you have not already done so, you must consider that risk now, particularly if it is foreseeable that buildings and water systems may remain shut down or subject to low usage for several weeks. Where conditions for Legionella bacteria growth exist, there is always an opportunity to put measures into place that reduce that risk.

For simple hot/cold water systems, a review could be straightforward. The main objectives should be to prevent stagnation and keep water temperatures outside of 20-50°C. If possible, aim to ensure the turnover of any water stored in tanks every 24 hours and movement of water through pipework and outlets at least once a week to prevent it from becoming stagnant.

If this cannot be achieved because the building is closed, or there is significantly reduced use, you will need to take additional steps beyond your current control measures

to ensure this can be achieved so far as you can. This may include flushing the entire water system (all outlets) weekly and, if possible, dropping the level of stored water in tanks.

If hot water systems are switched off to conserve energy, ensure water stored in any associated tanks is also turned over within 24 hours. Regular temperature checks across the water system at various outlets as described in [HSG274 Part 2 – The Control of Legionella Bacteria in Hot and Cold Water Systems](#) assist in confirming that water is not warming up to a point at which Legionella growth may occur, and demonstrate that stagnation is being prevented if they are typically satisfactory and consistent across the system.

Advice for reopening

If you have already reviewed your risk assessment and implemented additional control measures, then it is unlikely you will need to take any further steps prior to reopening.

A building is more likely to be safe to reopen without additional measures if:

- Flushing of the water systems has been undertaken weekly
- Water temperatures at outlets have been checked and are consistently in line with the recommendations in [HSG274 Part 2 – The Control of Legionella Bacteria in Hot and Cold Water Systems](#).
- Any microbiological sampling undertaken over the course of the lockdown indicates no significant change in the total viable count (TVC) and Legionella bacteria samples have returned as not detected or satisfactory

Note – there is no legal requirement to undertake microbiological sampling but where it has been undertaken then it may provide assurance and confirmation that control measures have been effective.

Where no additional action has been taken, or you are concerned about the effectiveness of controls implemented, you must take reasonable steps to ensure the safety of the water system prior to reopening. It is foreseeable that some increase in bacterial levels will have occurred. Such water systems should not simply be put straight back into use and a plan should be formulated to allow safe start-up prior to reopening the building.

Any plan should consider the competency and health and safety of individuals carrying out the work. The hazards from Legionella bacteria will likely be greater than expected under normal conditions so measures such as limiting the production of water droplets (aerosol), minimising exposure to those droplets and even use of respiratory protective equipment should be considered.

Where you have concerns, for example if you have previously experienced problems with Legionella in your water system, external advice should be sought from a competent person who may be able to assist remotely or through attendance on site.

Additional steps to take prior to reopening could include:

- Flushing through simple hot/cold water systems with fresh mains water for several minutes
- Increasing the temperature of hot water systems to above 60°C if possible and drawing it through to all hot water outlets (a temperature over 60°C will kill Legionella bacteria over time)
- Flushing through larger hot/cold water systems (including those with tanks, showers, calorifiers etc.) for a significant period of time
- Ensuring that the system is capable of delivering water at safe temperatures by checking temperatures ahead of reopening
- Undertaking a chemical or thermal disinfection of the water system
- Undertaking microbiological sampling for Legionella bacteria

Note – increasing the water temperature to 60°C and above can result in a scalding risk. While water should

be stored at 60°C, there should be a thermostatic mixing valve before the tap to reduce the temperature to around 43°C. This is especially important in settings such as nurseries, play centres, care homes and day centres to protect vulnerable groups.

Something as simple as flushing taps can generate water droplets, so plan in advance how you can do this safely. This could include running taps at low velocity or flushing shower heads into a part filled container of water, ensuring that the showerhead is submerged under the water in the container.

System disinfections take significant time and are typically undertaken with chlorine at harmful levels. They will likely require specialist assistance from a water treatment contractor. Their services may be in high demand at this time so you are advised to contact such service providers as soon as possible if disinfection may be required.

Microbiological sampling could assist in determining the degree of risk any water system currently poses and demonstrate whether any steps taken have been effective. It involves taking a sample of water and sending it to an appropriate laboratory for analysis. It will also likely require specialist assistance from a water treatment contractor. Such sampling should be undertaken 48 hours after any flushing and disinfection and may need to be repeated a few weeks later to ensure that effective controls are being maintained.

Each individual water system within a building or workplace is likely to need some degree of individual consideration as no two systems are entirely alike.

Note – if water systems are already subject to poor or no control, then this guidance may be insufficient to achieve safe reopening. Further specialist risk assessment from a competent person is likely to be required to determine appropriate steps and control measures.

Additionally, some systems believed to be under good control may now find that previous high levels of use and turnover have masked existing issues that may become apparent within periods of low use.

References

HSE Legionella and Legionnaires' Disease Advice

HSG274 Part 2 – The Control of Legionella Bacteria in Hot and Cold Water Systems

HSE Legionella & Legionnaires' Disease FAQs

The Legionella Control Association

HSE Advice on Legionella Risks in Your Workplace

Guidance on investigating cases, clusters and outbreaks of Legionnaires' disease for Public Health England health protection teams

Health and Safety at Work etc. Act 1974

Management of Health and Safety at Work Regulations 1999

Control of Substances Hazardous to Health Regulations 2002

L8 Approved Code of Practice and guidance on regulations

ESGLI Guidance for managing Legionella in building water systems during COVID-19 pandemic

Further guidance for complex water systems

Swimming Pools: PWTAG Temporary Pool Closure Guidance

Spa Pool System: HSE HSG282 Spa Pool Systems

Cooling Towers: The Control of Legionella Bacteria in Evaporative Cooling Systems

Other Risk Systems: The Control of Legionella Bacteria in Other Risk Systems

Credits

CIEH is grateful to the following for assistance in providing this guidance:

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