

LEISURE & AMENITIES COMMITTEE – 11 AUGUST 2025**REPORT FOR INFORMATION****PUBLIC TOILET CLEANING CONTRACT – CONTRACT AWARD**

Our Culture	Our Decision Making	Our Environment	Our Money	Our People	Our Places	Our Resilience & Wellbeing
						
	✓		✓			✓

Background:

The Public Toilet Cleaning Contract Tender has been completed. Following the full tender process, with the procurement support of Steve Sandercock of Kennel Consulting, the returned tenders were assessed against the published scoring criteria by the Town Clerk, RFO and Leisure and Amenities Manager.

At the end of the scoring, Crystal Clear Cleaning scored the highest of the returned responses and have been appointed to deliver the Public Toilet Cleaning Contract from 1 October 2025.

The contract is for an initial two-year period with the option to extend by three, one-year extensions to maximum contract period of five years.

Ben Bros gall
Leisure and Amenities Manager
Penzance Council

LEISURE & AMENITIES COMMITTEE – 11 AUGUST 2025**REPORT FOR INFORMATION****PENZANCE FOOTBALL CLUB WATER RISK ASSESSMENT 2025**

Our Culture	Our Decision Making	Our Environment	Our Money	Our People	Our Places	Our Resilience & Wellbeing
						
						✓

Background:

An updated water risk assessment has been produced for Penzance Football Club. The report is attached in the appendix below.

Penzance Football Club have been given a copy of the report to highlight the priority areas to be focussed on. Conversations will be held between Penzance Council officers and representatives from the Football Club to ensure that the required items are resolved in a timely manner and it is understood that work has begun to rectify some of the items highlighted in the report.

Penzance Football Club are planning on inviting Members of Penzance Council to the Football Club in the near future to show the development work that has been undertaken at the club and to talk about their plans for the future.

Appendix 1 – Penzance Football Club – Water Risk Assessment 2025

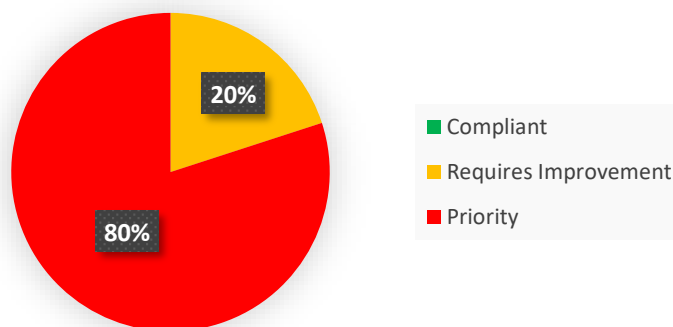
Ben Bros gall
Leisure and Amenities Manager
Penzance Council

LEGIONELLA RISK ASSESSMENT REVIEW

PENZANCE AFC CLUB HOUSE



Management of Water Hygiene Risk



Risk Assessment Review Carried out by:

Liam Cottrell MWM Soc (Snr) on behalf of Penzance Council

Date: 03/07/25

Suggested Review Date: July 2027 (or any significant change)

Issued to: Ben Brosgall (Leisure & Amenities Manager)

Risk Assessment Site Address:

Alexandra Place,
Penzance,
Cornwall,
TR18 4NE

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Legionnaires' Disease: What You Need to Know

Have you ever heard of Legionnaires'

disease? It's a serious type of pneumonia that can make you very sick or even kill you. It's caused by a bacteria called Legionella, which can also cause a less severe illness called Pontiac fever. Legionella bacteria live in freshwater environments, such as lakes and streams. Still, they can also grow and spread in manufactured water systems, such as certain types of air conditioning, hot tubs, fountains, and plumbing systems.



You can get infected with Legionella bacteria by breathing in tiny droplets of water that contain the bacteria. You can't catch it from another person. The chances of getting Legionnaires disease depend on how much bacteria are in the water, how long and how close you are exposed to it, and your overall health and age. Some people are more likely to get sick than others, such as people who are over 50, smokers, have lung problems, or have weak immune systems, but anyone can contract it.



The symptoms of Legionnaires disease can show up within 2 to 10 days after exposure to the bacteria. They include fever, chills, cough, trouble breathing, muscle pain, headache, and confusion. You may also have stomach problems like diarrhoea, nausea, and vomiting. Legionnaires disease can be very dangerous if you don't get treatment right away with antibiotics. About 1 in 10 people who get it die from it.

How to prevent Legionnaires disease

- The best way to prevent Legionnaires disease is to keep water systems in good condition by maintaining cleanliness, avoiding water stagnation, and avoiding water temperatures that will encourage legionella growth.
- Keeping Risk Assessments up to date and actioning any recommendations by priority
- For more information, visit the HSE website by clicking [HERE](#)

What has changed since the last risk assessment?

This section provides a summary of any significant changes or outstanding issues identified since the previous Legionella risk assessment was completed.

Significant Changes	RAG Level
None	NOT RELEVANT
Issues remaining since the last report	
One gas-fired water heater remains non-functional, creating potential for water stagnation and bacterial growth.	PRIORITY
The second water heater is only producing water at 42C, below safe levels.	
There is still no structured Legionella management system, no water safety plan, and no staff have been trained in Legionella control.	
Point-of-use water heaters in the toilets continue to run below 50C.	REQUIRES IMPROVEMENT
Are there any new issues?	
A faulty combi boiler in the bar kitchen, leaving water temperatures too low for both hygiene and safety.	REQUIRES IMPROVEMENT
A broken cold tap in the Changing Room 2 basin, leading to stagnant water in the pipe.	
An out-of-order toilet cubicle may also be contributing to stagnation.	
What has been updated in this report?	
- Reinspection of the domestic water systems and identification of any conditions that may promote Legionella growth - Revised risk evaluation based on current findings - Updated “Works to Be Undertaken” Section - Revised and updated water system schematic	
Has the risk level changed since the last risk assessment?	
No, both the initial and remaining risk levels remain unchanged.	
Initial Risk = The actual level of risk before any control measures are implemented	
Remaining Risk = The level of risk remaining after safety control measures have been implemented	

What is the risk of Legionella infection? Detailed risk evaluation

To determine this, it is essential to examine the factors that contribute to the initial risk.

CONTAMINATION (How will Legionella bacteria enter the system)	RISK
Small amounts of Legionella bacteria can enter through the mains water supply — this is normal.	LOW
AMPLIFICATION (Conditions that will help Legionella grow)	HIGHER
Several parts of the building are creating ideal conditions for bacteria to multiply. Hot water temperatures are too low, some heaters aren't working, and there are unused pipes and outlets where water sits still. These issues have been ongoing for years, increasing the chance of bacteria building up in the system.	
TRANSMISSION & EXPOSURE (How likely is it that water spray will be created and inhaled)	MEDIUM
Some taps and showers produce spray or mist, especially in the changing rooms and kitchen area. If Legionella is present in the water, people could breathe it in during normal use. These kinds of outlets raise the risk of exposure.	
PERSON SUSCEPTIBILITY (Person's vulnerability to infection)	MEDIUM
The clubhouse is used by a wide range of people. While most healthy individuals are at low risk, there may be older adults or those with health conditions who are more vulnerable if they come into contact with contaminated water spray.	
LEGIONELLA MANAGEMENT SYSTEM (Is the risk being managed effectively)	HIGHER
There is no proper management system in place. No one has been trained, no one is responsible for overseeing controls, and there are no clear procedures being followed. Basic tasks like flushing taps or checking water temperatures are either missed or not carried out correctly, and there is no written Water Safety Plan to guide staff.	

OVERALL RISK SCORE	INITIAL:	MEDIUM
	REMAINING:	MEDIUM – UNACCEPTABLE
While some control measures are in place, they are not being carried out correctly or consistently. Flushing, temperature checks, and cleaning routines lack structure and oversight, with no formal training provided and no one appointed to manage water safety responsibilities. As a result, key issues — such as low hot water temperatures, disused outlets, and potential dead legs — have remained unresolved for an extended period. The current management approach does not provide adequate protection against Legionella risks. Without improvements in training, leadership, and routine controls, the system cannot be considered safe in the long term.		

	Higher / Unacceptable Risk
	Medium / Tolerable Risk
	Low / Acceptable Risk

What needs to improve – Hot & Cold-Water Systems

ISSUE 1: FIRST IDENTIFIED IN 2021 RA		GAS FIRED WATER HEATER 1 – FAULTY WATER HEATER	
	RISK LEVEL / TIMESCALE		HIGH – AS SOON AS POSSIBLE
	ISSUE		SOLUTION
	Gas-fired water heater 1 (right side) is faulty and not heating water. For a 360 photo view of the location, click HERE. Why It Matters: Only one of the two water heaters is in use, but the hot water pipes from both units are joined downstream. This allows water to stagnate in the inactive heater and its pipework, creating a potential breeding ground for Legionella. Since the systems are connected, bacteria from the stagnant leg could contaminate the main supply. Even if outlet temperatures were compliant, cooler water from the dormant pipework may mix in, reducing the effectiveness of temperature control. To minimise risk, the unused heater and its pipework should be isolated and drained or reinstated into full use.		To reduce the risk of Legionella growth, there are two straightforward options. The first is to get both water heaters working together, so hot water flows evenly through the system and no sections are left unused. If that's not possible right now, the second option is to fully isolate and drain the unused heater and its connected pipework. Importantly, at the point where the two hot water pipes join together, the disused pipe should be cut out of the system and capped off as close to the junction as possible. This prevents any stagnant water from remaining in a dead leg.
Source for recommendations:		Temperature control is the traditional strategy for reducing the risk of legionella in water systems. Cold water systems should be maintained, where possible, at a temperature below 20 °C. Hot water should be stored at least at 60 °C and distributed so that it reaches a temperature of 50 °C within one minute at the outlets. [HSG 274 Part 2, 2.6]. TMV valves should be as close to the POU as possible to minimise the storage of blended water" [HSG 274 Part 2, 2.76].	

What needs to improve – Hot & Cold-Water Systems

ISSUE 2: FIRST IDENTIFIED IN 2021 RA		GAS FIRED WATER HEATER 2 – LOW HOT WATER TEMPERATURE	
	RISK LEVEL / TIMESCALE		HIGH – AS SOON AS POSSIBLE
	ISSUE		SOLUTION
	Gas-fired water heater 2 (left side) is only operating at 42°C <u>For a 360 photo view of the location, click HERE.</u> Why It Matters: The showers at the clubhouse are supplied by instantaneous water heaters set to deliver water at 42 °C. While this type of system avoids storing hot water, reducing the risk of stagnation, it doesn't remove the risk of Legionella, especially because showers produce fine water droplets (aerosols) that can be breathed in. Legionella bacteria grow best in water between 20 °C and 45 °C. Since the hot water is set to 42 °C, it's within that risk range. Normally, systems are designed to store hot water at 60 °C and deliver it at 50 °C or higher to help control bacteria. That's not happening here, likely because there are no thermostatic mixing valves (TMVs) to prevent scalding, so the temperature has been turned down at the heater instead.		The most effective solution is to increase the water heater temperature and install thermostatic mixing valves (TMVs) at each outlet. These valves safely mix hot and cold water just before it's used, allowing the system to operate at higher temperatures (around 60 °C) to control Legionella, while delivering safe temperatures at the taps and showers. Each shower should have a TMV fitted as close as possible to the outlet, and every hand wash basin needs its own TMV. As an interim measure, a weekly thermal disinfection routine can be used while waiting for TMVs to be installed. This involves raising water heater temperatures to at least 60 °C and flushing all hot outlets, especially showers, until the outlet temperature reaches 60 °C for 7 minutes. While this may temporarily reduce Legionella levels, it is not a long-term substitute for proper temperature control through a compliant system design and should only be used as an interim measure..
Source for recommendations:		<i>Stagnation can lead to conditions which encourage the growth of biofilm and legionella. To reduce the risk, outlets on hot and cold water systems should be used at least once a week to maintain a degree of water flow and minimise the chances of stagnation." (HSG274 Part 2, para 2.50)</i>	

What needs to improve – Hot & Cold-Water Systems

ISSUE 3: FIRST IDENTIFIED IN 2021 RA		FEMALE TOILET – DEAD LEG OF PIPE (NEXT TO WATER HEATER)	
		RISK LEVEL / TIMESCALE	HIGH – AS SOON AS POSSIBLE
		ISSUE	SOLUTION
		There is a capped-off water pipe (from an unknown source) that protrudes from the ceiling above. This pipe may be a hot water pipe that previously served the basins. For a 360 photo view of the location, click HERE. Why It Matters: • This capped-off dead leg can create a significant risk for Legionella bacteria, especially if it was originally part of the hot water system. • Stagnant water: Once a pipe is capped and unused, water inside it no longer circulates. If the pipe previously carried hot water, residual warmth in the pipe (particularly within the 20–45 °C range) can support bacterial growth. • Hidden and unflushed: Because the pipe is now isolated, it's not flushed during normal use, so any bacteria or biofilm inside can thrive undisturbed. • Potential reintroduction: If the dead leg is ever accidentally reconnected or backflow occurs (e.g. from nearby pressure fluctuations), it could contaminate the live water system.	The dead leg should be cut back to the nearest live branch in the system. It's important to trace the origin of the capped pipework—if it was previously part of the hot water supply (e.g. to a shower), the risk is higher due to the potential for warm stagnant water. Simply leaving the pipe capped and unused allows water to sit undisturbed, which encourages bacterial growth. Removing the redundant section altogether ensures there's no hidden stagnation point.
Source for recommendations:		<i>Stagnation can lead to conditions which encourage the growth of biofilm and legionella. To reduce the risk, outlets on hot and cold water systems should be used at least once a week to maintain a degree of water flow and minimise the chances of stagnation." (HSG274 Part 2, para 2.50)</i>	

What needs to improve – Hot & Cold-Water Systems

ISSUE 4: LEGIONELLA WATER SAMPLING – SHOWERS	
RISK LEVEL / TIMESCALE	HIGH – AS SOON AS POSSIBLE
ISSUE	SOLUTION
Given that key issues—such as low hot water temperatures, lack of TMVs, an inactive water heater, and possible dead legs—have persisted since at least 2021 (as noted in the previous risk assessment), it would be sensible to take Legionella samples from the showers. These outlets are part of a system with several identified risks, and sampling will help determine whether Legionella is present and guide the urgency and extent of any necessary remedial work. It's a practical and proportionate step, particularly in the absence of effective control measures over the past few years.	Collect three Legionella water samples: one from each of the two main shower rooms and one from the referee's shower.
Source for recommendations:	<i>4.5 Reactive sampling - Where there is doubt about the efficacy of the control scheme, e.g. poor temperature/biocide control, further sampling should be undertaken as necessary to determine if colonisation has occurred as a result and to assist with determining the appropriate response to the failure. (British Standards BS7952-2022 - code of practice for sampling water systems for Legionella bacteria.</i> <i>Testing for Legionella and other bacteria Usually it is only necessary to test for Legionella in hot and cold water systems where validating a control regime other than temperature or where there is some question over the performance of any biocide or other chemical or physical control in use, or when controls (temperature or other) fail. In some circumstances, as determined by a risk assessment, monitoring might be appropriate, for example, in premises where there are people especially vulnerable to Legionella infection or in the event of one or more cases or suspected cases of Legionella infection. Many commercial premises are also tested as a matter of routine, even though they do not fall into any of these risk categories. The results of any such monitoring need to be considered in the risk assessment. (HSE HSG 274 Part 2)</i>

What needs to improve – Hot & Cold-Water Systems

ISSUE 5: MALE & FEMALE TOILET WATER HEATERS – LOW HOT WATER TEMPERATURE	
	RISK LEVEL / TIMESCALE MODERATE – AT THE NEXT OPPORTUNITY
	ISSUE Both water heaters are only operating at 41 and 42°C, respectively. Why It Matters: - Both POU water heaters are supplying water at 41 °C and 42 °C, which is not hot enough to control the growth of Legionella bacteria. This temperature range is ideal for bacterial proliferation and falls below the recommended minimum of 50 °C at outlets used for control purposes. Because these units are small (10 litres) and located close to the outlets, they lack a long distribution system, but the risk still exists, especially if water sits unused for long periods, or if the heaters cycle on and off at low temperatures. - The hand wash basins are used by a wide range of building users, including those with disabilities, some of whom may be more vulnerable to infection. This increases the importance of maintaining safe water temperatures as part of a broader duty of care.
	SOLUTION The best approach is to raise the temperature settings on both point-of-use (POU) water heaters so that water reaches at least 50 °C at the outlet. To prevent the risk of scalding, particularly as the basins are used by potentially vulnerable users, including those with disabilities, install thermostatic mixing valves (TMVs) to each water heater. These will safely blend the hot water down to a suitable handwashing temperature (typically around 41 °C), while still allowing the POU heaters to operate at temperatures that help control bacterial growth. Interim Control (short term) <i>Run each hot tap daily until the hot water is cold to reduce stagnation and flush through any low-temperature water.</i>
Source for recommendations:	<i>Low storage volume heaters serving hot water outlets should be able to achieve a peak temperature of 50–60 °C and where the thermostat is set at these temperatures for this purpose, staff and other users should be informed not to adjust the heater. A unit which is not capable of achieving this, eg a preset thermostat, should only be used where there is a very high turnover or an alternative control measure is in place. (HSG274 Part 2, para 2.69)</i> <i>Where there are vulnerable people present (eg the very young, elderly or disabled), additional care should be taken to ensure that hot water outlets do not present a scalding risk. Thermostatic mixing valves (TMVs) or other appropriate temperature control devices should be fitted and maintained to ensure safe outlet temperatures. (HSG274 Part 2, para 2.56)</i>

What needs to improve – Hot & Cold-Water Systems

ISSUE 6:	COMBI BOILER (STORE ROOM 1) – NOT HEATING WATER		
	RISK LEVEL / TIMESCALE	MODERATE – AT THE NEXT OPPORTUNITY	
	ISSUE	SOLUTION	
	The Combi Boiler is not heating water. For a 360 photo view of the location, click HERE. Why It Matters: - The gas-fired combi boiler supplying hot water to the bar kitchen is not currently heating water, although flow is still present. This poses a concern for Legionella control because the water temperature remains within the ideal growth range (20–45 °C). Without sufficient heating (minimum 50 °C at outlets), the system cannot control bacterial growth effectively, especially if the pipework allows water to stagnate or cool between uses. - In a food preparation environment, this also raises additional hygiene concerns. Hot water is essential for effective hand washing and equipment cleaning. Using lukewarm water compromises these practices, increasing the risk of cross-contamination or poor cleaning standards.	The combi boiler pressure gauge is reading zero, indicating a loss of system pressure. Rectify as necessary to ensure it reliably heats water to at least 50 °C.	
Source for recommendations:		Hot water should be distributed so it reaches a minimum temperature of 50 °C within one minute at outlets." [HSG 274 Part 2] Every sink must have an adequate supply of hot and cold water for washing food and be of drinking quality. (Food Standards Agency)	

What needs to improve – Hot & Cold-Water Systems

ISSUE 7: CHANGING ROOM 2 – FAULTY BASIN COLD TAP	
	RISK LEVEL / TIMESCALE MODERATE – AT THE NEXT OPPORTUNITY
	ISSUE The basin cold tap is not working. For a 360 photo view of the location, click HERE. Why It Matters: - A non-functioning cold tap means water is sitting unused in the pipework, creating a dead leg. Stagnant water at ambient temperatures (especially between 20–45 °C) provides ideal conditions for Legionella bacteria to grow. - Without regular flow, biofilm can form inside the pipe, supporting bacterial colonisation. This can affect both the cold and, indirectly, the hot system due to cross-connection.
	SOLUTION The best option is to get the cold tap in Changing Room 2 working again. Flush thoroughly before use.
Source for recommendations:	<i>Stagnation can lead to conditions which encourage the growth of biofilm and legionella. To reduce the risk, outlets on hot and cold water systems should be used at least once a week to maintain a degree of water flow and minimise the chances of stagnation." (HSG274 Part 2, para 2.50)</i>

What needs to improve – Hot & Cold-Water Systems

ISSUE 8:	FEMALE TOILET – OUT OF ORDER TOILET CUBICLE		
	RISK LEVEL / TIMESCALE		MODERATE – AT THE NEXT OPPORTUNITY
	ISSUE		SOLUTION
	The far right toilet cubicle is out of order. For a 360 photo view of the location, click HERE. Why It Matters: - A non-functioning cold tap means water is sitting unused in the pipework, creating a dead leg. Stagnant water at ambient temperatures (especially between 20–45 °C) provides ideal conditions for Legionella bacteria to grow. - Without regular flow, biofilm can form inside the pipe, supporting bacterial colonisation. This can affect both the cold and, indirectly, the hot system due to cross-connection.		The lack of regular cistern flushing means water remains stagnant in this part of the system. Stagnant water can support the growth of Legionella and other bacteria, particularly if the cubicle is brought back into use without proper cleaning or flushing. It also creates a potential dead leg if left unused long-term. As such, the disused outlet should either be brought back into use or included in a weekly flushing regime.
Source for recommendations:		<i>Stagnation can lead to conditions which encourage the growth of biofilm and legionella. To reduce the risk, outlets on hot and cold water systems should be used at least once a week to maintain a degree of water flow and minimise the chances of stagnation.” (HSG274 Part 2, para 2.50)</i>	

What needs to improve – Hot & Cold-Water Systems

ISSUE 9: BAR AREA – ICE MACHINE (CLEANING ARRANGEMENTS)							
	<table><tr><th>RISK LEVEL / TIMESCALE</th><th>MODERATE – PLANNED MAINTENANCE</th></tr><tr><th>ISSUE</th><th>SOLUTION</th></tr><tr><td> The bar's ice machine chamber, whilst clean, should be included (if not already) in a 3-monthly cleaning regime. Contaminated ice can result in Legionella infection, but other harmful pathogens are a notable risk. Consequences: Pseudomonas aeruginosa: This bacterium is commonly found in water and can readily form biofilms. It can cause a range of infections, including skin infections, ear infections, urinary tract infections, and pneumonia, particularly in individuals with weakened immune systems. Salmonella: These bacteria are a common cause of foodborne illness, leading to symptoms like diarrhoea, fever, and abdominal cramps. Contaminated water used to make ice or poor hygiene during handling can introduce Salmonella into the ice. What is Biofilm? - In simple terms, biofilm is a sticky layer of microorganisms, like bacteria (including Legionella) and fungi, along with the slimy substances they produce. Think of it like plaque on your teeth, but inside water systems. </td><td> If not already in place, implement a three-month cleaning regimen and descale if scale is visible. It is important to note that the Food Standards Agency emphasises that ice should be treated as a food product and handled with the same level of care and attention as other food items. This means that ice should be produced, stored, and served in a manner that minimises the risk of contamination and ensures its safety for consumption. For a 360 photo view of the bar area – click HERE </td></tr></table>	RISK LEVEL / TIMESCALE	MODERATE – PLANNED MAINTENANCE	ISSUE	SOLUTION	The bar's ice machine chamber, whilst clean, should be included (if not already) in a 3-monthly cleaning regime. Contaminated ice can result in Legionella infection, but other harmful pathogens are a notable risk. Consequences: Pseudomonas aeruginosa: This bacterium is commonly found in water and can readily form biofilms. It can cause a range of infections, including skin infections, ear infections, urinary tract infections, and pneumonia, particularly in individuals with weakened immune systems. Salmonella: These bacteria are a common cause of foodborne illness, leading to symptoms like diarrhoea, fever, and abdominal cramps. Contaminated water used to make ice or poor hygiene during handling can introduce Salmonella into the ice. What is Biofilm? - In simple terms, biofilm is a sticky layer of microorganisms, like bacteria (including Legionella) and fungi, along with the slimy substances they produce. Think of it like plaque on your teeth, but inside water systems.	If not already in place, implement a three-month cleaning regimen and descale if scale is visible. It is important to note that the Food Standards Agency emphasises that ice should be treated as a food product and handled with the same level of care and attention as other food items. This means that ice should be produced, stored, and served in a manner that minimises the risk of contamination and ensures its safety for consumption. For a 360 photo view of the bar area – click HERE
	RISK LEVEL / TIMESCALE	MODERATE – PLANNED MAINTENANCE					
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Source for recommendations:	The Food Safety Act 1990 classifies food as “any substance or product, whether processed, partially processed or unprocessed, intended to be, or reasonably expected to be ingested by humans. ‘Food’ includes drink, chewing gum and any substance, including water, intentionally incorporated into the food during its manufacture, preparation or treatment.						
The Food Safety Act 1990							

What needs to improve – Management & Control

ISSUE 1:		FIRST IDENTIFIED IN 2021 RA	LACK OF A SUITABLE & SUFFICIENT WATER HYGIENE MANAGEMENT SYSTEM	
ACTION LEVEL / TIMESCALE		PRIORITY – AT THE NEXT EARLIEST OPPORTUNITY		
		ISSUE	SOLUTION	
		There is currently no suitable water hygiene management system in place at the clubhouse. No one has ever received formal Legionella training, and there are no clear procedures for carrying out routine safety checks such as flushing, temperature monitoring, or showerhead cleaning. As a result, these tasks are either not being done or not being done correctly. No responsible person has been officially appointed to oversee Legionella control, which means there is no clear ownership of these duties and no consistent oversight to make sure they're being carried out properly. This lack of structure has led to ongoing issues being missed or left unresolved, including multiple hot water heaters delivering water below safe temperatures. Several outlets are running at 41–42°C, which sits within the ideal growth range for Legionella bacteria. These low temperatures have been present for years and pose a higher risk when there is no system in place to detect or act on them. There is also no Water Safety Plan in place — the basic document that sets out what needs to be done, how often, and what to do if something goes wrong. Without this, even well-meaning efforts can fall short, because there is nothing to guide or track progress. Given the number of unresolved issues since 2021, the poor water temperatures, and the diverse group of people using the building, putting a proper system in place should now be a top priority. This should start with formal training and the appointment of someone to take responsibility for water hygiene on an ongoing basis.	To establish an effective water hygiene management system: • Appoint a Responsible Person and a Deputy to take ownership of Legionella control measures. • Provide formal Legionella training, including Legionella awareness, to all staff involved in any aspect of water hygiene control, such as flushing, temperature checks, record-keeping, and system oversight. • Introduce a Water Safety Plan that clearly outlines the system layout, control measures, task frequencies, and roles and responsibilities. • Carry out regular Legionella Controls as highlighted in this document. • Maintain accurate records of all checks and actions taken, and review them regularly to ensure tasks are being completed. • Review the risk assessment every two years, or sooner if significant changes occur.	
Source for recommendations:		<i>Dutyholders, including employers and those in control of premises, have a legal responsibility to comply with health and safety law. To do so, they must identify and assess sources of risk, prepare a written scheme for preventing or controlling the risk, and implement, manage, and monitor precautions. Regular monitoring is considered essential for control measures to remain effective</i>		
HSE ACOP L8				

What needs to improve – Management & Control

ISSUE 2:	LEGIONELLA CONTROL MEASURES	RECOMMENDED TIMESCALE AT THE EARLIEST OPPORTUNITY
Flushing of little-used outlets (Weekly) – There are no records to show that little-used outlets are flushed weekly, or at least they are considered with procedures to back this up. A little-used outlet is a water outlet that hasn’t been used within a 7-day period. Particular consideration should be given to the showers, where it is not always possible to determine actual usage during a normal week. Action – <i>Monitor usage of outlets on a weekly basis, or if in doubt, “flush it out” to the water temperature stabilises, e.g. the hot water is “hot” and the cold water is “cold”</i>		PRIORITY
Routine Water Temperature Checks – Whilst water temperature checks are carried out, the lack of necessary training and procedures has led to incorrect methods being used. This is evident because long-term hot water temperature issues are not being identified. - Gas Fired Water Heater Flow (50°C +) temperature to be monitored monthly - Hot & Cold sentinel taps (nearest and furthest from the source) to be monitored monthly - Combi Boiler Flow (50°C +) to be monitored monthly - Point of Use Water Heater Flow (50°C +) to be monitored monthly Action – <i>Implement the above using correct methods and equipment (training should be carried out) and keep written records of this action.</i>		
Shower Head Cleaning & Disinfection (three monthly) – There are no records to show that shower heads and hoses (where fitted) are stripped, cleaned and disinfected. Cleaning removes the dirt, scale, and biofilm where Legionella can hide and feed. Disinfecting kills any Legionella and other germs that are present. Action—Implement the above using correct methods and keep written records.		
Source for recommendations:		
<i>These Regulations require employers to prevent, or where this is not reasonably practicable, adequately control, the exposure of any employees to substances hazardous to health. Employers are also required to maintain, examine, and test control measures and, at suitable intervals review and, if necessary, revise those measures. They must also keep suitable records of examinations, tests, and repairs of control measures. (HSE ACOP L8 page 16 & HSE HSG 274 Part 2, page 31)</i> <i>The risk from exposure should normally be controlled by measures which do not allow the growth of legionella bacteria in the system, and which reduce exposure to water droplets and aerosols. (HSE ACOP L8, page 16, para 59)</i>		

Identification of Key Personnel

Descriptions of the roles and requirements of each position can be found in the HSE ACOP L8 (4th Edition) – The Control of Legionella Bacteria in Water Systems

Penzance AFC Club House

MAIN DUTY HOLDER		RESPONSIBLE PERSON	
Name:	<u>Penzance Council</u>	Name:	Not Appointed
Position:	Building Owner	Position:	
Name:	<u>Penzance AFC</u>	Contact Number:	
Position:	Building Operator	Relevant Training?	
DEPUTY RESPONSIBLE PERSON		OTHER KEY PERSONNEL	
Name:	Not Appointed	Name:	Not Appointed
Position:		Position:	
Contact Number:		Contact Number:	
Relevant Training?		Relevant Training?	

	Priority
	Refresher Training Needed
	In Date

LEGIONELLA CONTROL RISK ASSESSOR	
Company:	Liam Cottrell Legionella Control Specialist
Contact:	Liam Cottrell
Position:	Proprietor
Contact Number:	07388 917987
Email:	Liam@lcssouthwest.com
Address:	46 New Park, Horrabridge, Yelverton, Devon PL20 7TF
Tasks Assigned:	Risk Assessment

Building Description

The Penzance AFC clubhouse is made up of several key areas that support both matchday activities and community use:

- The main bar area, which includes a fully licensed bar, seating, and entertainment like a projector screen, pool table, and dartboard
- A function room and kitchen, regularly used for events, catering, and private hire
- A changing room block, complete with showers, toilets, and handwashing facilities for players and officials
- A meeting area and accessible amenities, including ramped access and updated visitor toilets

Altogether, the clubhouse caters to a wide range of social, sporting, and day-to-day needs. This means the hot and cold water systems need to reliably support everything from post-match showers to kitchen use and general hygiene in toilets and handwashing areas.

Although the building is owned by Penzance Council, the day-to-day running and upkeep of the clubhouse is managed by Penzance AFC.

Location:

A Google Maps view of the Clubhouse can be accessed by clicking [HERE](#).

For a 360 virtual tour of the building, click [HERE](#)

Types of Water Systems in Use – Penzance AFC Clubhouse.

Cold Water Services

All cold-water services are supplied directly from the mains water supply.

There are no domestic water tanks in use within the building.

Hot Water Services

Types of hot water services installed include:

- Gas-Fired Water Heaters
- Point of Use Water Heaters
- Gas-Fired Combi Boiler



When should this risk assessment be reviewed?

This risk assessment should be reviewed regularly or when no longer considered to be valid, resulting from:

- Changes to the water systems or their use.
- Changes to the use of the buildings where the water system is installed.
- The availability of new information about risks or control measures.
- The results of checks indicate that control measures are no longer effective.
- A case of Legionnaire's disease is associated with any of the systems.

Identified risk systems within the scope of this risk assessment:

System Type	Installed and included?
Domestic Hot & Cold-water systems	YES

DEFINITIONS & EXPLANATIONS

HAZARD

Anything with the potential to cause harm can include articles, substances, plant or machines, methods of work, the working environment, and other aspects of work organisation.

RISK

The likelihood that a hazard will cause harm in combination with the severity of injury, damage or loss that might foreseeably occur.

INITIAL RISK

The actual level of risk before any control measures are implemented.

REMAINING RISK

The level of risk remaining after safety control measures have been implemented.

Acceptable - *The existing controls are adequate. Nothing more needs to be done.*

Tolerable - *This is unacceptable but can be tolerated until remedial work/control measures are implemented. Interim control measures may be necessary (if recommended in this report)*

Unacceptable - *The risk level is too high for the situation to remain the same. Immediately implement remedial work/control measures to reduce the risk level to an acceptable level.*

CURRENT FREQUENCY OF CONTROL MEASURES

Service	Task	Minimum Recommended Frequency	Current Frequency
Risk Assessment & Risk Assessment Reviews	Carry out a full Legionella Risk Assessment. The risk assessment should be reviewed regularly or when no longer considered to be valid, resulting from: • Changes to the water systems or their use • Changes to the use of the buildings where the water system is installed. • The availability of new information about risks or control measures • The results of checks indicate that control measures are no longer effective. • A case of Legionnaires' disease is associated with any of the systems.	Recommended at 2-year intervals, unless no longer considered valid. Ultimately, it comes down to risk assessment.	The previous RA was carried out just over 3 years ago.
Legionella Management System	A suitable & sufficient legionella management system should include: • Managers appointed to the roles of the responsible & deputy responsible person to oversee legionella control managerially. • Suitable training is provided that is relevant to roles and the site. • A customised Water Safety Plan • Implementation of the Water Safety Plan • Suitable record-keeping	Meet the criteria outlined in the left column.	No suitable management system is in place.
Little-used outlets	Flushing little-used outlets to avoid water stagnation. A little-used outlet is defined as an outlet that has not been used within 7 days or an outlet that has not been used sufficiently to maintain a good water turnover when connected to a larger system.	Weekly	Lack of training & procedures suggests that any flushing may prove ineffective.

Criteria for Grading	
	Inadequate
	Requires Improvement
	Good

NOTE: Only control measures that are deemed necessary by the risk assessor are shown here

CURRENT FREQUENCY OF CONTROL MEASURES (CONTINUED)

Service	Task	Minimum Recommended Frequency	Current Frequency
Hot Water Services	Monitoring and recording gas-fired water heaters & sentinel temperatures to ensure a flow temperature of no less than 50°C.	Monthly	Lack of training & procedures suggests that any checks may prove ineffective.
	Sentinel outlet temperatures must be no less than 50°C within one minute of running.		
	Monitoring and recording Combi Boiler and point-of-use water heater flow temperatures to ensure a flow temperature of no less than 50°C		
Cold water services	Temperatures of cold-water supplies shall be monitored at sentinel points to ensure that they do not rise above 20 degrees centigrade at sentinel taps after running for two minutes.	Monthly	
Shower Head Cleaning	Clean, Disinfect, & Descale showers to remove any signs of dirt and scale.	Quarterly or as necessary	

Criteria for Grading	
	Inadequate
	Requires Improvement
	Good

NOTE: Only control measures that are deemed necessary by the risk assessor are shown here

Water System Asset Quantities (What is in the building that is relevant)

Cold water services	Quantity
Mains supply cold water outlets	28
Sentinel Outlets	2
Hot water services	Quantity
Gas-Fired Water Heaters	2
Gas-Fired Water Heater Outlets	11
Combi Boilers	1
Combi Boiler Outlets	3
Low Volume POU Water Heaters	2
Low Volume POU Water Heater Outlets	5
Sentinel Outlets	5
General facilities	Quantity
Sinks / Basins	11
Toilets	8
Urinals	3
Showers	9

Temperature Readings – Representative Sample (Legionella can grow at certain temperatures)

BUILDING LOCATION		TEMP OF COLD °C 2 MIN	TEMP OF HOT °C 1 MIN	SYSTEM NUMBER		FLOW	RETURN
				COLD	HOT		
1	CHANGING ROOM 1 - BASIN	15	42	MAINS	GAS FIRED WH 1 + 2	15	NO RETURN
2	CHANGING ROOM 2 - BASIN	15	42			42	
3	FEMALE TOILET - BASIN	15	41		POU 1	41	
4	MALE TOILET - BASIN	15	42		POU 2	42	
5	KITCHEN - SINK	15	16		COMBI	FAULTY	

-  = PASS - Within HSE recommendations
 = FAIL - Not within HSE recommendations
 = FAIL - Not within HSE recommendations and **within** the legionella growth range

About the Legionella Risk Assessor

Introduction

A legionella risk assessor plays a critical role in identifying and mitigating the risks associated with Legionella bacteria in water systems. They possess a combination of technical expertise, practical experience, and comprehensive knowledge of regulatory standards, ensuring the safety and compliance of various facilities.



Professional Experience

Years of Experience

Liam Cottrell is a seasoned risk assessor with over 28 years of dedicated experience in the field of legionella control, allowing them to proficiently identify risk areas and recommend effective control measures.

Liam is a senior member of the Water Management Society and is entitled to use the MWMsoc designation after their name.

Key Responsibilities

- Conducting detailed risk assessments of water systems to identify potential Legionella hazards.
- Developing and implementing control measures to mitigate identified risks.
- Performing regular monitoring and testing of water systems for the presence of Legionella bacteria.
- Providing comprehensive reports and recommendations to clients for maintaining compliance with health and safety regulations.
- Training and advising facility management and staff on Legionella control and prevention strategies.

Technical Skills and Expertise

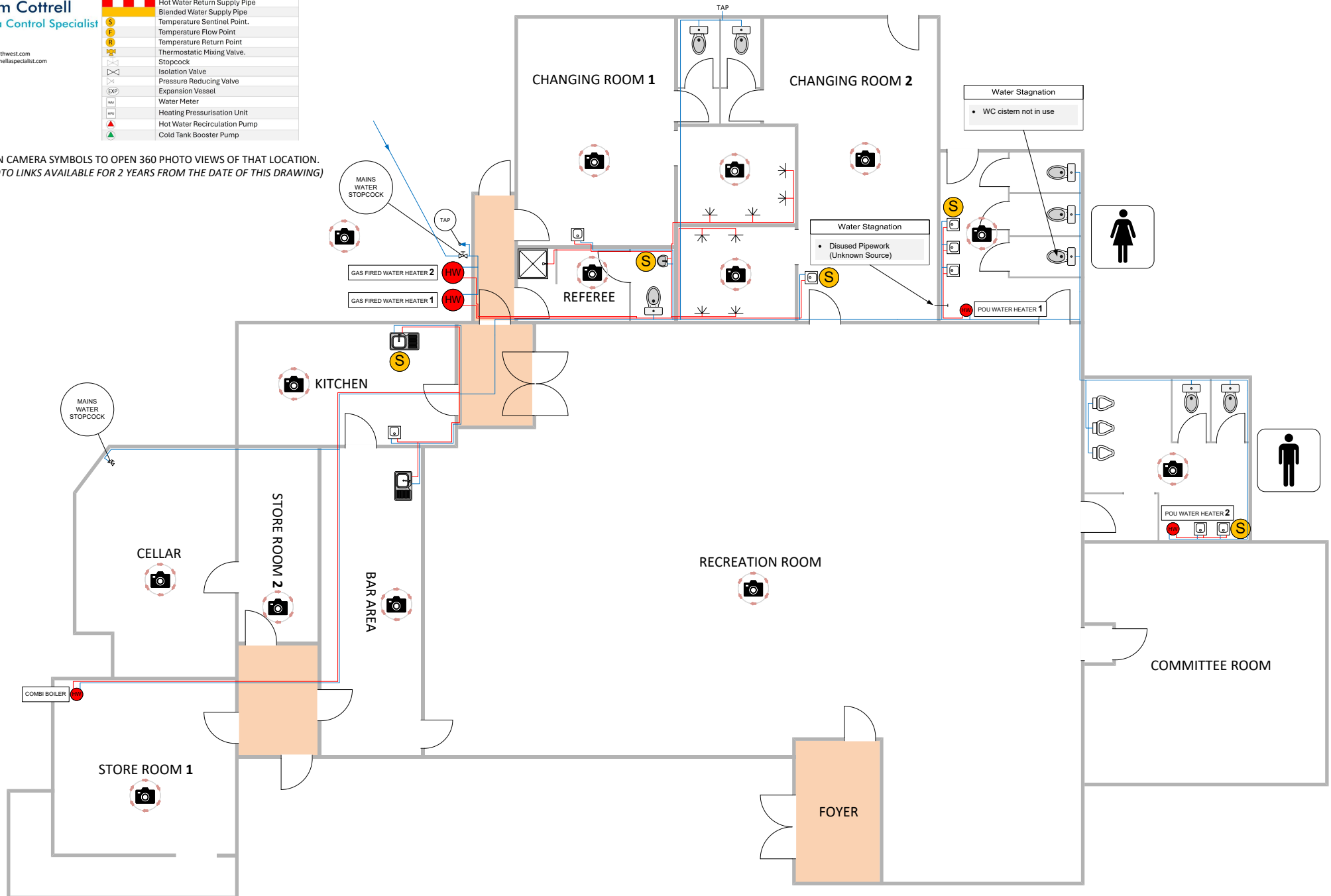
Liam Cottrell is proficient in:

- Understanding the microbiological aspects of Legionella bacteria and their behaviour in water systems.
- Utilising advanced testing and sampling techniques to detect Legionella.
- Interpreting laboratory results and identifying correlations with potential risk factors.
- Applying knowledge of plumbing systems and other water-related infrastructure.
- Staying updated with current guidelines, such as those from the Health and Safety Executive (HSE) and the British Standards Institute.

Tel: 07388 917987
Email: liam@kcssouthwest.com
www.liam@kcleionellaspecialist.com

Symbol	Description
	Mains Water Supply Pipe
	Tank Cold Supply Pipe
	Hot Water Supply Pipe
	Hot Water Return Supply Pipe
	Blended Water Supply Pipe
	Temperature Sentinel Point.
	Temperature Flow Point
	Temperature Return Point
	Thermostatic Mixing Valve.
	Stopcock
	Isolation Valve
	Pressure Reducing Valve
	Expansion Vessel
	Water Meter
	Heating Pressurisation Unit
	Hot Water Recirculation Pump
	Cold Tank Booster Pump

CLICK ON CAMERA SYMBOLS TO OPEN 360 PHOTO VIEWS OF THAT LOCATION.
(360 PHOTO LINKS AVAILABLE FOR 2 YEARS FROM THE DATE OF THIS DRAWING)



LEISURE AND AMENITIES COMMITTEE – 11 AUGUST 2025**REPORT FOR INFORMATION****BUDGET COMPARISON REPORT**

Our Culture	Our Decision Making	Our Environment	Our Money	Our People	Our Places	Our Resilience & Wellbeing
						
		✓	✓		✓	

Background:

Below is the budget comparison report from April to August 2025.

Financial Budget Comparison for Leisure & Amenities Committee

Comparison between 01/04/25 and 04/08/25 inclusive. Includes due and unpaid transactions. Includes commitments.

Excludes transactions with an invoice date prior to 01/04/25

		2025/26	Reserve	Actual Net	Balance
INCOME					
Leisure & Amenities Committee					
100	Wellfields Car Park	£102,500.00	£0.00	£39,238.73	£-63,261.27
115	Allotment Rents	£4,900.00	£0.00	£178.00	£-4,722.00
130	The Lodge	£0.00	£0.00	£2,000.00	£2,000.00
131	Misc	£2,500.00	£0.00	£0.00	£-2,500.00
135	Penzance AFC	£5,500.00	£0.00	£2,291.65	£-3,208.35
140	Open Spaces	£0.00	£0.00	£0.00	£0.00
Total Leisure & Amenities Committee		£115,400.00	£0.00	£43,708.38	£-71,691.62

Financial Budget Comparison

for Leisure & Amenities Committee

Comparison between 01/04/25 and 04/08/25 inclusive. Includes due and unpaid transactions. Includes commitments.

Excludes transactions with an invoice date prior to 01/04/25

		2025/26	Reserve	Actual Net	Balance
EXPENDITURE					
Leisure & Amenities Committee					
1000	L&A Team Salaries	£376,383.00	£0.00	£120,474.22	£255,908.78
1001	Travel Allowance	£200.00	£0.00	£0.00	£200.00
1015	Penlee Park	£36,080.00	£0.00	£5,564.89	£30,515.11
1030	Vehicles and Machinery	£30,142.00	£0.00	£7,953.90	£22,188.10
1040	Protective Clothing & Equipment	£5,250.00	£0.00	£1,418.59	£3,831.41
1045	Allotments	£10,647.00	£0.00	£2,396.56	£8,250.44
1055	Weed Control	£3,000.00	£0.00	£1,620.15	£1,379.85
1060	Wellfields Car Park	£33,235.00	£0.00	£13,634.92	£19,600.08
1064	Outdoor Gym	£250.00	£0.00	£7.49	£242.51
1071	Community Toilets	£25,192.00	£0.00	£5,463.00	£19,729.00
1111	Wherrytown Skate Park	£3,590.00	£0.00	£987.80	£2,602.20
1115	War Memorials	£1,500.00	£0.00	£856.55	£643.45
1120	Penzance Football Club	£500.00	£0.00	£740.00	-£240.00
1130	Open Spaces	£20,250.00	£0.00	£5,197.60	£15,052.40
1140	Water Fountains	£3,150.00	£0.00	£979.51	£2,170.49
1165	Toilets	£182,675.00	£0.00	£45,185.48	£137,489.52
1211	The Lodge	£7,500.00	£0.00	£1,176.63	£6,323.37
1270	Devolution - Surveys & Inspections	£0.00	£0.00	£0.00	£0.00
1280	Tree Management	£15,000.00	£0.00	£0.00	£15,000.00
1310	Alexandra Play Park & Tennis Courts	£25,050.00	£0.00	£16,441.30	£8,608.70
1320	Princess May Recreation Grounds	£19,625.00	£0.00	£6,074.29	£13,550.71
1330	Foxes Lane Play Park	£2,250.00	£0.00	£560.32	£1,689.68
1995	Reserve Contributions	£203,041.00	£0.00	£0.00	£203,041.00
Total Leisure & Amenities Committee		£1,004,510.0	£0.00	£236,733.20	£767,776.80
Total Leisure & Amenities		£115,400.00	£0.00	£43,708.38	-£71,691.62
Total Leisure & Amenities		£1,004,510.0	£0.00	£236,733.20	£767,776.80
Total Net Balance		-£889,110.00		-£193,024.82	

LEISURE AND AMENITIES COMMITTEE – 11 AUGUST 2025

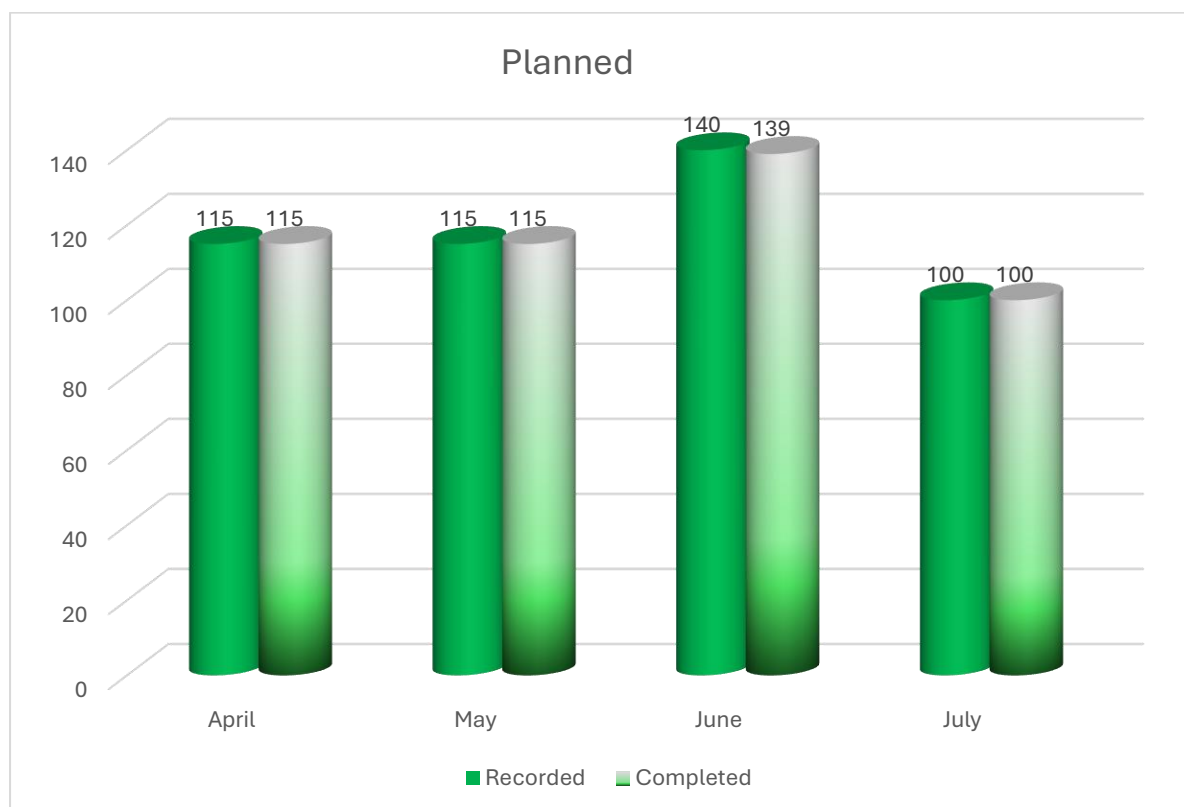
REPORT FOR INFORMATION

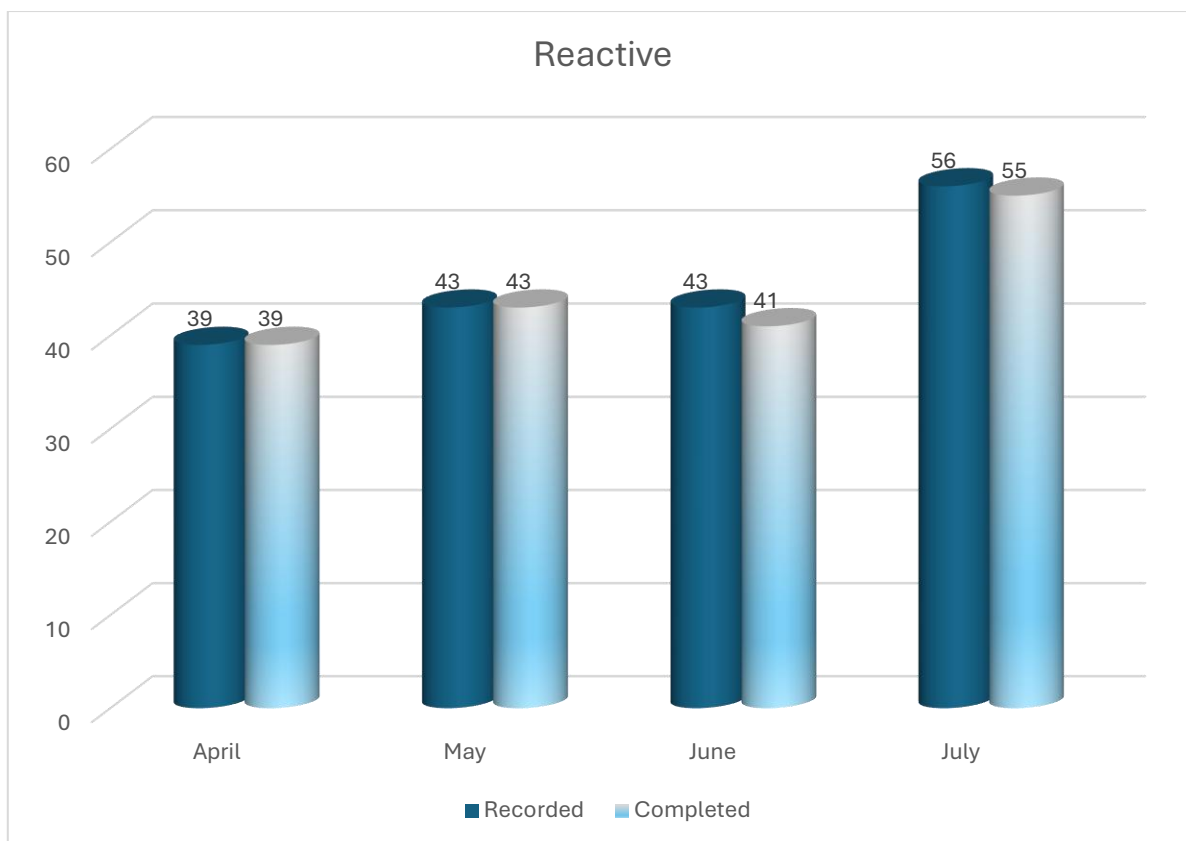
OPERATIONAL PERFORMANCE REPORT

Our Culture	Our Decision Making	Our Environment	Our Money	Our People	Our Places	Our Resilience & Wellbeing
						
		✓	✓		✓	

Background:

The Leisure and Amenities performance report for April, May, June and July is below.





These figures represent both planned and reactive maintenance and upkeep tasks completed by the team throughout the first quarter of the 2025/26 financial year. Completion results against recorded items have remained high so far. No specific trends have been identified in relation to the types of incidents being recorded and reported. The majority of reactive reports requiring investigation still relate to Cornwall Council areas of responsibility and the majority of these relate to fly tipping.

In terms of planned works, the flat roof inspection of the football club was not completed throughout June due to contractor availability and this will be booked in as soon as possible.

Ben Bros gall
Leisure and Amenities Manager

LEISURE AND AMENITIES COMMITTEE – 11 AUGUST 2025

REPORT FOR INFORMATION

PROJECT UPDATES

Our Culture	Our Decision Making	Our Environment	Our Money	Our People	Our Places	Our Resilience & Wellbeing
						
	✓	✓	✓	✓	✓	✓

Background:

Re Painting of Alexandra Play Park and Tennis Courts

DA Giles have been appointed to undertake the re painting of the tennis courts at Alexandra Play Park. The work will be programmed in outside of the school holiday period.

Specification of External Areas – Alexandra Play Park

A number of pre specification pieces of work need to be completed before bringing a specification back to the Committee. Items including drainage inspections will help to ensure that the returned quotes are as accurate as possible.

Wellfields Car Park – Layout / Surface / Drainage

An order has been raised for the production of necessary surveys and documents to assist with the re design of Wellfield's Car Park. We should shortly be in possession of measured surveys, space planning documents (layouts) and an estimation on the impact of future income generation as a result of any proposed re design.

South Pier Public Toilets

An updated report has been provided to this Committee meeting.

Princess May Recreation Ground

A water heater has been installed at Princess May Rec office. In addition, a number of safety works are shortly going to be progressed utilising the “safety work reserve” established to address urgent H&S items on the site. Identified works currently include a replacement roundabout and wet pour (est £20,000), emergency repairs to swing sets (£1,800). We are also progressing quotes for a number of sections of fencing and for some bollards to be installed at each entrance of the site to improve site security.

Penlee Park – Natural Spring – Penlee Park Pond.

A natural spring exists at the bottom end of Penlee Park, adjacent to the pond. Whilst not presenting a hazard in itself, the spring can lead to a build-up of algae which in turn, makes some of the surfaces slippery. The spring was not present in 2023 but was in 2018 – 2022 and 2024. The proposals to “rectify” the issue have so far identified extensive excavation and rebuilding and any future proposals will be brought to the committee alongside a cost / benefit analysis.

Initial meetings with contractors have identified a possible solution for this site which will include redirecting the flow of water into the pond. This would be far less invasive and present a more cost effective fix should further examination not identify any issues.

Ben Bros gall
Leisure and Amenities Manager