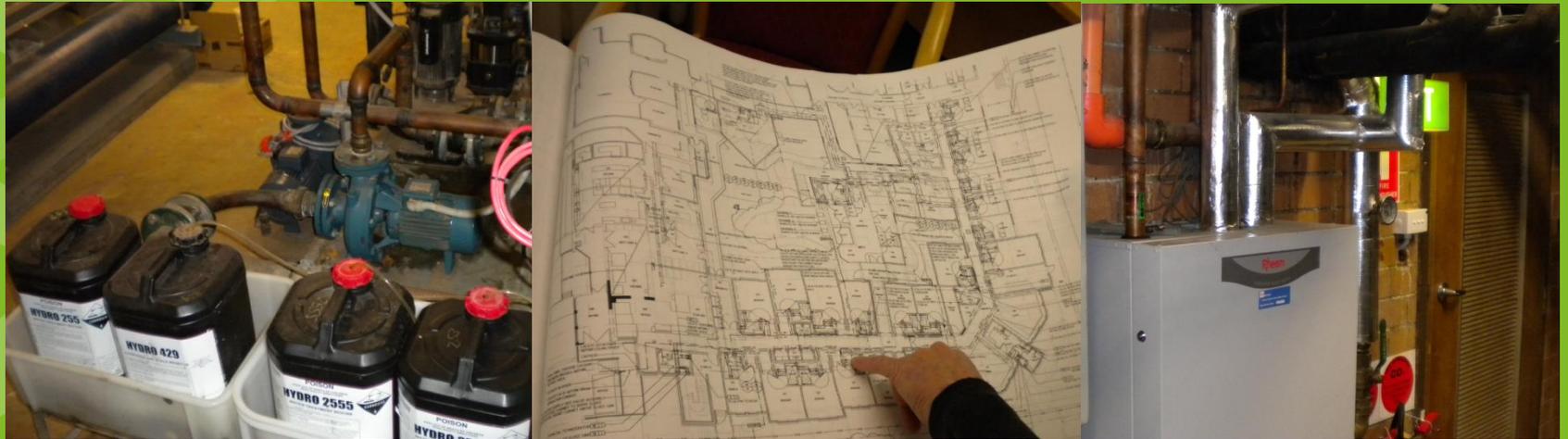


# *Legionella* Regulations: Independent inspections



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SA Health



Government  
of South Australia

SA Health

# Overview

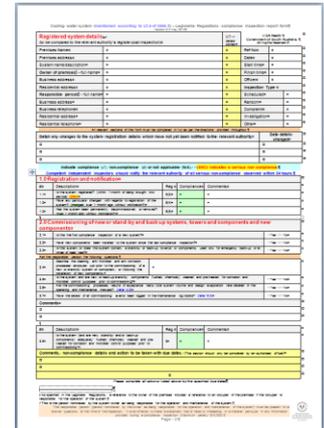
- > Regulation 15(2) – now six years in operation
- > Inspection forms
- > Pros and cons / for and against / benefits and disadvantages
- > Independent inspector issues
- > Responding to independent inspection reports
- > Recommendations

## Regulation 15(2)

- > A new method of monitoring environmental health regulatory compliance in South Australia
- > Commenced with first SA Legionella regulations on the 1st October 2008
- > Created a new industry of independent Legionella Regulations inspection

# Inspection forms

- > Absence of useful inspection forms noted
- > Created for EHO training day Sept 2009 – Fullarton
- > Intended and promoted for use by independent inspectors
- > Combine all supporting document considerations
- > Have been modified by some councils for EHO use
- > [www.sahealth.sa.gov.au/legionella](http://www.sahealth.sa.gov.au/legionella)



# The independent inspection stakeholders

- > Local authorities (councils)
- > Environmental health officers
- > System owners
- > Public health
- > Maintenance / water treatment contractors
- > Independent inspectors

# Pros and cons



## > Local authorities (councils)

PROS	CONS
Workload	Inadequately skilled staff
Work health and safety risk	Public health risk
	Organisational risk

## > Environmental health officers

PROS	CONS
Avoid need to skill up	Work variety
	Resolving non compliance
	Disease investigations

# Pros and cons



## > System owners

PROS	CONS
Choose own inspector	Cost

## > Public health

PROS	CONS
Industry expertise / knowledge utilised	Questionable inspectors
	No powers to direct / ensure access
	Delays in dealing with non compliance

# Pros and cons



## > Contractors

PROS	CONS
Business opportunities	Inspected by competitors

## > Independent inspectors

PROS	CONS
No approval – business opportunity	Liability

# Independent inspector issues

- > Competency
- > Conflict of interest
- > Quality of reports
- > Consulting
- > Honesty / integrity / misrepresentation
- > Insurance

**National Regulatory Food  
Safety Auditor Guideline**

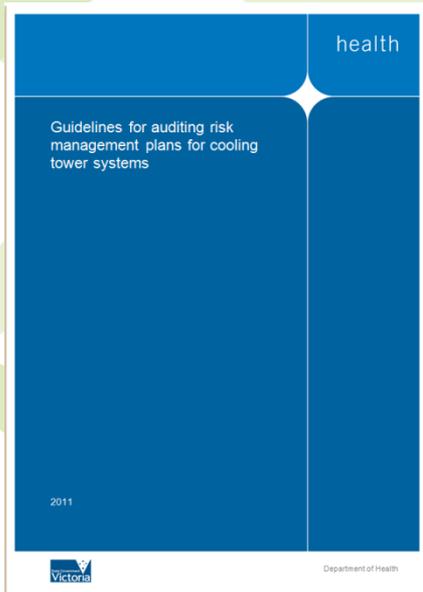
Developed by the  
Implementation Sub-  
Committee of the Food  
Regulation Standing  
Committee.

Version 1.2 – 9 November  
2009

1

# Something is missing

- > Approved qualifications / training
- > Guidelines for independent inspectors / auditors
- > Code of practice / conduct for independent inspectors
- > Independent inspector approval scheme
- > Published list of approved independent inspectors



# Responding to independent inspection reports

- > Timely assessment
- > Scrutinise thoroughly
- > Question and clarify
- > Inspect and confirm reported non compliance
- > Undertake random verification inspections
- > Report incidents, issues and concerns

# Recommendations

- > Undertake at least a portion of annual inspections
- > Focus on high risk and problematic systems
- > Unsure – phone a friend
- > Use inspection forms to guide questions



Health Protection Programs

SA Health

Ph. 8226 7100

<http://www.sahealth.sa.gov.au/legionella>

Protecting public health > water quality >  
Legionella regulations and guidelines

**QUESTIONS ?**

SA Health



# **Government of South Australia**

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