

CONTROL OF LEGIONELLA POLICY

Presented to:

Trustees Resource Committee
18 June 2025

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Date reviewed: ²	18 June 2025
Date of next review: ³	Summer 2028

¹ This is the date the policy was approved by the meeting

² This is the date the policy was reviewed prior to its approval above

³ This is the date as set by the policy review clause or the date approved plus three years

Footnote:

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Control of Legionella

Legionella Risk Management Policy

Purpose

The purpose of this policy is to ensure that as far as possible all users of the Four Cs Multi Academy Trust (MAT) are protected from the incidence of Legionnaire's disease.

Policy Detail

All schools are required to have a professional Legionella Risk Assessment carried out every 2 years. A site-specific log book shall be in place to record all the routine testing as it is carried out.

The Trust will ensure that the relevant testing is completed and that an up-to-date risk assessment is carried out by a professional company.

Reporting

The Site Manager of each school will report termly to the Trust Board and Local Governing Committee via completion of a Premises Report. The report will confirm that the testing has been carried out and identify any results that may be of concern.

Review and Evaluation

On receipt of the professional risk assessment the Site Manager will review the necessary actions and ensure that these are carried out in a timely manner. The actions will be reported via the Premises Report.

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1. Purpose

- 1.1. It is the policy of the Four Cs MAT to ensure that appropriate precautions for the control of Legionella bacteria are identified through a 'Legionella' risk assessment process, and appropriate control measures implemented to ensure, so far as is reasonably practicable, the health, safety and welfare of employees and others. The minimum standards to be met include:
- Carrying out Suitable and Sufficient Legionella Risk Assessments.
 - Preparation of an Action Plan or written scheme for preventing or controlling the risk, where appropriate.
 - Implementation, management, monitoring and recording of precautions to include regular inspection, microbiological monitoring, temperature checks and flushing, where appropriate.
 - Seeking suitable advice and assistance from competent persons, Health and Safety Team/Advisors, or Water Treatment and Hygiene Specialist.
 - Appointment of a person or persons to be managerially responsible for water systems at each school, ie the Responsible Person and Competent Person.
 - To otherwise meet the requirements of the HSE Approved Code of Practice. 'Legionnaire's disease: The Control of Legionella bacteria in water systems. 2000 (L8)'.
- 1.2 The Health and Safety Executive promotes sensible risk management, and states that this is not about: creating a totally risk-free society; generating useless health and safety paperwork; exaggerating or publicising trivial risks; stopping recreational activities where the risks are managed.

2. Scope and Application

- 2.1. This policy applies to all school buildings within the Trust with water systems including: hot and cold-water supply systems, cooling towers, spa baths, pools and showers where the Four 's Trust is either the 'employer' or is in control of the premises.
- 2.2. In accordance with the Four Cs MAT 'Policy for Health and Safety', Headteachers are responsible for implementing the Health and Safety Policy and this Legionella policy within their respective school.

3. Background

- 3.1. Legionella bacteria are naturally present in the environment and if water conditions are favourable to the bacteria ie warm, nutritious and stagnant, they will proliferate. Disturbance of this 'contaminated' water can cause tiny droplets to become airborne which, if inhaled, can cause a potentially fatal type of pneumonia called Legionnaires disease. Those people especially at risk are the old or those who are ill as their immune system is less able to fight the disease.
- 3.2. Making sure adequate and appropriate management arrangements exist for controlling Legionella is a requirement defined within the "Legionnaires disease; The Control of Legionella bacteria in water systems", Approved Code of Practice and Guidance L8". The Health and Safety at Work, etc Act 1974 and the Control of Substances Hazardous to Health 2002 (as amended), are both relevant to Legionella issues.

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- 3.3. The Approved Code of Practice has been produced to focus attention on those water systems where it is reasonably foreseeable for persons to be exposed to Legionella bacteria, where no controls are in place, such as cooling towers, evaporative condensers, plant where stored water temperature exceeds 200C and which releases an aerosol. The Approved Code of Practice Guidance states that, "Not all systems listed ... will require elaborate assessment and control measures. A simple risk assessment may show that the risks are low and in such case no further action will be necessary. Examples include small domestic-type water systems where temperatures and turnover are high, or where instantaneous water heaters are used".
- 3.4. This Procedure defines the system by which the Four Cs MAT manages the risk from Legionella and is focused upon preventing water conditions 'favourable' to the bacteria existing in any of the trusts water systems including hot and cold-water services, spa baths, pools and showers.

4. Definition of Terms

Legionella	A potentially dangerous type of bacteria when inhaled with water vapour. Bacterium grows best in warm, nutrient rich water
Legionella Risk Assessment	A specific risk assessment carried out to determine the risk level of Legionella proliferation, and exposure from a specific water system
H.S.E	Health and Safety Executive, the National Independent watchdog for work related health, safety and welfare
Responsible Person (RP)	The RP is defined in the Regulatory Reform (Fire Safety) order 2005, and other legislation, and this person has 'control' of the building and its facilities. The RP may appoint a Competent Person for the building, who is given the day-to-day responsibility for in-house checks
Logbook	A record book provided to record all local checks and tests carried out, as specified by Legionella risk assessment, eg sentinel taps hot water temperature checks
Maintenance	Cleaning, repair, tests etc. required to minimise bacterial growth. This will be co-ordinated by the Site Manager at each school
Sentinel Taps	These are the taps at the start and end of a re-circulating hot or cold-water distribution system, which will be nearest and furthest from the storage tank

5. Roles and Responsibilities

- 5.1. **Trustees:** To provide suitable and sufficient resources for the CEO and Headteachers in order for them to carry out their duties and responsibilities in accordance with this Procedure. Monitor the application of this procedure.
- 5.2. **CEO:** Formally identify the Headteacher who will be responsible for each school. Ensure that managers and staff assist the RP and CP for Legionella issues.
- 5.3. **Responsible Person (Headteacher):** Ensure the Legionella risk assessment addresses all water systems in the premises. The Headteacher (RP) will appoint a Competent Person (CP) who will have the day-to-day responsibility for implementation of the Legionella policy and testing. The CP will normally be the Site Manager. For low risk and simple water systems the risk assessment may only need to be reviewed by the RP or CP on a 2 yearly basis. Where the premises has a complicated hot and cold-water distribution system, and/ or

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complex equipment, eg evaporative condenser, and there is not expertise on site, then specialist Legionella services should be bought in.

- 5.3.1. Where necessary, as specified by the risk assessment, the RP needs to identify, appoint, instruct and train a member of staff to carry out regular visual inspections and temperature checks in accordance with the logbook, where appropriate. An appropriate thermometer should also be provided and maintained for this purpose eg digital probe thermometer. Where not included within the Legionella Risk Assessment, appendix 2 should be completed using relevant information included within Legionella Risk Assessment and attached to the Legionella logbook and shared with appropriate Site Staff.
- 5.3.2. Notify the CEO of any alterations to the water systems and ensure the Legionella risk assessment is reviewed.
- 5.3.3. Monitor the controls to ensure they remain effective, eg inspect logbook to ensure maintenance and inspections are actually done and recorded. Keep records to provide evidence you are complying with the above standards where needed (as identified by risk assessment).
- 5.3.4. Notify the CEO of any planned or unplanned visits by any enforcement authority (ie Water Company, HSE). Also, to notify any problems with the water system / Legionella precautions immediately to the CEO if appropriate. In partnership with the CP, monitor the works of any contractors carrying out work on any water systems in the school for which you are responsible.
- 5.4. Nominate a Competent Person(s) to complete the logbook where necessary (see appendix) ensuring instructions are followed.
- 5.5. Arrange a specialist contractor to carry out Legionella risk assessments for building water system facilities if requested, where this service is needed.
- 5.5.1. Arrange for a specialist contractor to carry out remedial works/recommendations arising from risk assessments where requested by the RP. Monitor compliance with the requirements of this procedure and provide timely reports to the Trust Board and Local Governing Committee.
- 5.5.2. Ensure the risk of Legionella is considered at the design stage of any building/ structural alteration project.
- 5.6. Ensure the appropriate staff have received the appropriate Legionella training. Advice and assistance in support of this procedure, and the HSE ACOP should be sought if required. Monitor and periodically audit building arrangements, to ensure appropriate Legionella controls are in place.

6. Risk Assessment

- 6.1 Each school must undertake a Legionella Risk Assessment (LRA). Those schools which have a low-risk water system, where the risk assessment has identified as insignificant risk, are unlikely to need to take any further measures after completion of the Legionella Risk Assessment. The HSE Approved Code of Practice states, "not all of the systems listed ... will require elaborate assessment and control measures. A simple risk assessment may show that the risks are low and in such case no further action will be necessary. Examples include small, domestic-type water systems where necessary temperatures and turnover are high, or where instantaneous water heaters are used".

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6.2 If the Legionella Risk Assessment has identified that the water system does not store water between the temperatures of 20°C and 50°C, then only monitoring will be needed to ensure that this control continues to be in place.

6.3 Record Keeping: If the risk assessment identifies the need for ongoing monitoring, the logbook as discussed in the appendix will need to be completed.

7. Training

7.1. A training needs analysis should first be undertaken. Schools where the risk assessment has shown there to be an insignificant Legionella risk are not likely to need any specific training. Where significant risk has been identified, and control measures need to be in place, the RP and/or CP for the school should have Legionella awareness training.

7.2. Headteachers responsible for the school must ensure that the Competent Person nominated to manage/perform temperature checks etc, fully understands the instructions provided.

7.3. Headteachers must ensure records of all training and instruction (where appropriate) are held in the Legionella logbook.

8. Advice and further information

8.1. Suspected Outbreak: If it is suspected that the schools water system is implicated in a Legionella disease case, the Headteacher and CEO must be notified immediately. An action plan shall be agreed with the corrective action.

8.2. Further advice, information and guidance to support this procedure can be obtained from the resources below:

- The Internet eg the official Health and Safety Executive website www.hse.gov.uk, which holds information on Legionella, and COSHH Regulations 2002.
- Guidance Documents/ Leaflets: Legionnaires' disease: The Control of Legionella bacteria in water systems. Approved Code of Practice 2000 (L8); IND (G) 253(L).

9. Policy Review

The Trust Board will review this policy in line with the procedure for policy review.

Date for Review

If no other reason for review (see policy review procedure) this policy will be reviewed in three years.

Appendix 1

Please see school specific logbook.

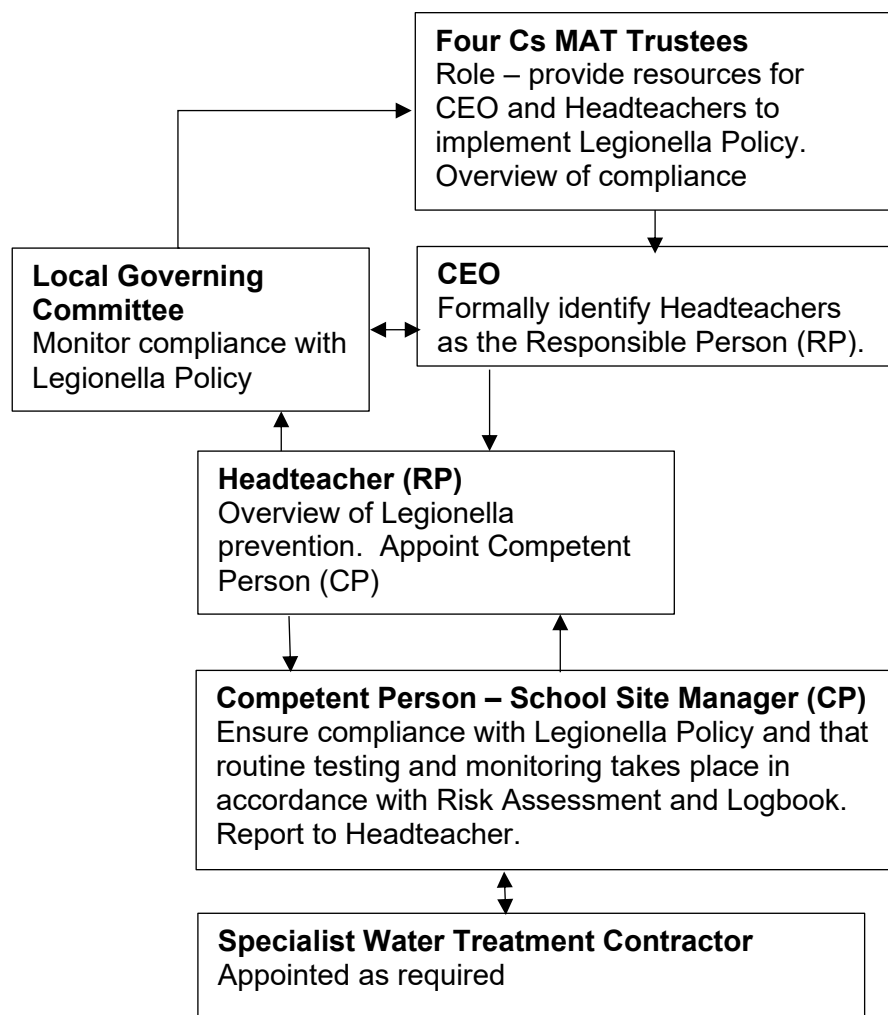
Appendix 2

Testing and maintenance template.

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Organisational Chart



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Appendix 2

Testing and maintenance template.

Appendix 2 Testing and maintenance template
Site Name: _____
Summary Of Frequency & Responsibility for Carrying Out Designated Tasks – Site Water Systems

Designated Task - Manual/Visual Checks	SITE					WTC				
	W	M	Q	B	A	W	M	Q	B	A
Carry out flushing of infrequently used outlets	W									
Carry out temperature checks on sentinel and representative hot & cold-water outlets		M								
Carry out temperature checks on calorifier flow & return pipework		M								
Clean & de-scale shower heads & hoses & kitchen spray heads			Q							
Inspect cold water tanks					A					
Carry out temperature checks on cold water tanks					A					
Carry out maintenance on thermostatic mixing valves (TMV's)					A					
Carry out temperature checks on TMV's hot inlet pipe		M								
Inspect (if possible) calorifiers internally or flush base of calorifiers					A					
Flush water heaters, inspect if possible					A					
*Carry out potable bacteria analysis on random mains water outlets										
*Carry out legionella analysis on random hot and cold-water outlets										
Water softener check salt level within the brine tank	W									
Service & Disinfect the water softeners.					A					
Swimming Pool inspection, disinfectant level, PH, dosing system, water clarity										
Swimming Pool - Carry out a back wash of the system										
Swimming Pool - Carry out filter/Strainer inspection										
Swimming Pool - Carry out Biological monitoring of pools to include TVC @37c, E-Coli, Coliforms and Pseudomonas										
Swimming Pool - Carry out inspection of Balance tank										
Miscellaneous	SITE					WTC				
	W	M	Q	B	A	W	M	Q	B	A
Audit site logbooks										A
*Review site water risk assessment										

KEY

WTC – Water Treatment Contractor

W – Weekly task

M – Monthly task Q – Quarterly task

B – Biannual task A – Annual task

D – Daily T – Twice Weekly

*Frequency should be determined by individual schools level of risk.

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Task Description	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
Weekly flushing of low use outlets												
Monthly sentinel temperature monitoring												
Monthly representative temperature monitoring												
Monthly calorifier flow and return temperature tests												
Quarterly shower and spray tap de-scaling												
Annual TMV service												
Annual calorifier flush & sample or inspection												
Annual water heater flush & sample or inspection												
Annual tank inspections												

Key: Water Treatment Contractor – W Site – S

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