

When Compliant Buildings Become Public News

What a map of UK Legionella closures since 2020 actually shows



Why this document exists

This document accompanies a postcode-level map of UK buildings that were closed, restricted, or operationally disrupted after Legionella was identified in their water systems between January 2020 and the present.

It does not exist to re-explain Legionella as a health risk.

Its purpose is to highlight a different, often underestimated exposure: reputational and operational risk created by late discovery.

Every site shown on the map was operating legally and managing Legionella risk at the time the issue was identified. In most cases, no one became ill. What followed instead was disruption — and public visibility.



What the map shows

Each marker on the map represents:

- A real UK building
- A confirmed Legionella-positive finding
- An operational impact (closure, delayed opening, restricted use, or relocation)
- An outcome significant enough to trigger public reporting

Only high-level information is included:

- Postcode area
- Year of discovery
- Facility type
- Nature of operational disruption

What the map deliberately does not show

The map does not indicate:

- Negligence or failure
- Lack of competence
- Absence of a Legionella control scheme
- Regulatory breach
- Illness or harm

In the majority of cases, Legionella was identified through routine monitoring, not as a result of illness. **This distinction matters.**

How compliant buildings became visible

Across the incidents shown, the sequence is consistent:

- A Legionella control scheme was in place
- Required checks were being carried out
- Legionella colonised part of the system quietly
- Discovery triggered precautionary operational action
- Operational disruption triggered public visibility

In most cases:

- No outbreak occurred
- No illness was reported
- Public attention followed disruption, not harm

Once a building closes, delays opening, or relocates occupants, the situation rarely remains private.



What "compliant" meant in these cases

UK guidance for Legionella control (ACoP L8 and HSG 274) defines the minimum measures expected to demonstrate control.

In practice, this typically includes:

- A Legionella risk assessment and written scheme
- Named responsibility
- Periodic temperature monitoring
- Flushing regimes
- Periodic microbiological sampling
- Records confirming checks were completed

These measures are designed to demonstrate that checks occurred, at defined intervals, and were documented.

They do not provide:

- Continuous visibility of system condition
- Early warning of deterioration
- Insight into what happens between checks

This is not a criticism of compliance. It is a description of its limits.

Why timing matters more than illness

UK health and safety law requires risks to be reduced as low as is reasonably practicable (ALARP).

What is considered "reasonably practicable" changes as:

- Buildings become more complex
- Portfolios expand
- Occupancy patterns fluctuate
- Technology becomes more accessible

This reframes the question from: *"Were checks completed?"*

to: *"How early could loss of control have been detected?"*

In practice, impact is determined not by whether illness occurs, but by:

- When deterioration is discovered
- How disruptive discovery becomes
- How visible that disruption is to others

The portfolio effect

The more sites an organisation operates, the greater the statistical likelihood that Legionella will manifest somewhere within the portfolio.

Not because:

- People are careless
- Controls are ignored
- Compliance is absent

But because:

- Checks are periodic
- Systems change between inspections
- Colonisation can occur silently
- Visibility is fragmented across sites

For multi-site operators, the primary risk is therefore not illness. It is reputational and operational exposure created by discovery and disruption.

A moment of reflection

Many people viewing this map will already know:

- Which site concerns them most
- Where water systems are fragile
- Where disruption would be hardest to explain

Quietly consider:

- What closure would mean for occupants
- How leadership would respond
- How quickly the situation would become public

No action is requested here. This document exists to support reflection — not judgement.

Conclusion

Compliance confirms that checks were completed. It does not show what happened between those checks.

Water compliance is a continuous journey, not a final destination.

For organisations responsible for multiple sites, protecting people and protecting reputation depend on the same thing: how early deterioration can be seen.