



Legionella Management Policy

September 2025

Signed (Chair of the Trust board):	
Date:	September 2025
Date of Review:	September 2026

Arbor Academy Trust reviews this policy annually. The Trustees may, however, review the policy earlier than this, if the Government introduces new regulations, or if the Trust receives recommendations on how the policy might be improved. This document is also available in other formats e.g. e-mail and enlarged print version, on request to the School Offices and is displayed on the schools' websites.

Policy Statement

The aim of this document is to define a policy for the control and management of legionella bacteria in water systems within the buildings owned and managed by Arbor Academy Trust. **The policy will inform the Legionella Management Operational Procedure.**

1. Scope

1.1 When visiting or working in and around Arbor Academy premises it is essential that the risk of exposure to legionella bacteria is minimised and strictly managed and controlled.

1.2 This policy is intended to ensure that Arbor Academy Trust meets the requirements of the HSC The Control of Legionella Bacteria in Water Systems; Approved Code of Practice and Guidance L8

1.3 This policy is also intended to ensure that the Arbor Academy Trust meets requirements made under the Health and Safety at Work etc. Act 1974. This imposes a 'Duty of Care' on Arbor in relation to its employees, students, visitors and contractors.

2. Discovery of Legionella Bacteria

In the event of the discovery of legionella bacteria within a water system, follow the guidelines as set out in **the Operational Procedure Document.**

3. Management Responsibilities

3.1 Statutory requirements

3.1.1 It is the overall responsibility of management to ensure that the Arbor Academy Trust's premises comply with all Health and Safety statutes.

3.1.2 Arbor Academy Trust has a duty under the Health and Safety at Work Act to ensure, as far as practicable, the health and safety and welfare of its employees, residents and visitors to its premises

3.1.3 Arbor Academy Trust has duties under the Health & Safety Commission Approved Code of Practice & Guidance L8 2001 to effectively manage Legionella within its owned or managed premises.

3.1.4 It is the overall responsibility of management to ensure that the Trust's premises comply with the Control of Substances Hazardous to Health Regulations (C.O.S.H.H.) pertaining to the work being carried out, substances used and substances discovered.

3.2 The Control of Legionella Bacteria in Water Systems: Approved Code of Practice & Guidance: L8

3.2.1 The principal statutory requirements for the control and management of legionella bacteria is the Health & Safety Commission Approved Code of Practice and Guidance L8. The

purpose of the regulation is to manage the risk from legionella to employees, students, visitors and contractors to the Trust's premises and they require duty-holders to:

- Identify and assess the risks of legionella bacteria in water systems
- Devise a scheme for eliminating or controlling the risk
- Manage the risk, selection and training of competent personnel
- Keep up to date records (electronically and log books on site)
- Manufacturers, suppliers, installers and users to address their responsibilities

3.2.2 The above requirements will be met by the following actions:

- Inspection of water storage tanks (Six monthly)
- Visual inspection of the hot water calorifiers (Annually)
- Visual checks of temperatures and settings of calorifiers (Monthly)
- Temperatures of hot and cold water outlets at Sentinel taps (Monthly)
- Legionella water samples taken (Annually)
- Cleaning and disinfection of shower heads (Quarterly)
- Flushing of infrequently used outlets (Weekly)
- Checking other outlets on a rotational basis over a 12 month period recording temperatures in a log book

3.2.3 Information from the register should be easily available to all interested parties.

3.3 Management of Health and Safety at Work Regulations 1999 etc

The Health and Safety at Work Regulations 1999 stipulate the need to carry out a suitable and sufficient assessment of the risks for all work activities, for the purpose of deciding what measures are necessary for safety.

3.4 Reporting of injuries or dangerous occurrences

All employees and contractors of Arbor Academy Trust are bound by the reporting requirements covered by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1985 (RIDDOR).

3.5 Health and Safety Executive Guidance

The Health and Safety Executive produces the following guidance notes and other publications to give supplementary information/clarification:

- The Control of Legionellosis including Legionnaires Disease

3.6 Legionella Management

3.6.1 School leadership team have responsibility for all aspects of legionella management, surveying, awareness and control.

3.6.2 The School leadership team is charged with the responsibility and duty to effectively control the risk from legionella bacteria and its products within the premises water systems.

3.7 Managerial authority and responsibility

3.7.1 The School Leadership Team has day-to-day responsibility for the management of the risk of exposure to legionella bacteria. It will clearly define:

- A safety policy detailing safe systems of work procedures
- How the policy will be managed, implemented, monitored, and reviewed.

3.7.2 All the School Leadership Team personnel will be made fully aware of their safety responsibilities. They will be given information and instruction to properly understand and carry out their duties in a safe manner in accordance with the Trust's policies, procedures and legislation.

3.7.3 The School Leadership Team shall be responsible for organising site surveys/ risk assessments as detailed in the Legionella Management Operational Procedure document.

4.0 Management Policy

4.1 Management Action

4.1.1 Arbor Academy Trust policy is to have an effective, robust and efficient system for the management of legionella.

4.1.2 Leadership will ensure that persons at all levels charged with a responsibility will be competent to undertake the task.

4.1.3 Leadership will provide immediate funding for emergency remedial work; other non-emergency works will be funded as detailed in the Legionella Management Operational Procedure.

4.2 Legionella Surveys/ Risk Assessments

4.2.1 Approved external contractors are responsible for carrying out risk assessments as instructed by Arbor Academy Trust

4.2.2 Risk Assessments are to be carried out on all properties that are part of Arbor Academy trust

4.2.3 Risk Assessment results will determine the required remedial Bylaw 30 or chlorination work required. This work will be prioritised by the 'responsible person'.

4.3 Legionella/ Water Treatment Contractors

4.3.1 Only those legionella/ water treatment contractors registered with and licensed by the HSE, and approved by the Board, will be permitted to carry out work on Arbor Academy Trust properties.

4.4 Training

4.5.1 Training regarding legionella awareness and surveying will be completed following a training needs analysis. Training will be cascaded from the School Leadership Team through to individual staff.

5 General Provisions

5.1 Scope and application of the policy

5.1.1 This policy shall be applied to the management of the control of legionella bacteria in water systems and is under the ownership and control of the management of Arbor Academy Trust.

5.2 Other safety rules, related documents and procedures

5.2.1 In addition to the application of this policy, other rules, policies and procedures issued by leadership or by other authorities shall be complied with in accordance with leadership instructions.

5.2 Information and Instruction

5.3.1 Arrangements shall be made to ensure;

- That all employees are adequately informed and instructed regarding the identification, management and risk from exposure to legionella.

5.3 Variation of this policy

No variation to this Policy or to the Legionella Management Operational Procedure will be allowed except following changes in Legislation, Good Practice Guides or other statutory documentation. This policy is subject to annual review.

Legionella Management Operational Procedure

Purpose of document

This document sets out procedures to control, manage, and minimise the risk of legionella bacteria in water systems. The procedures will be determined by the Arbor Academy Trust Legionella Management Policy.

1.0 Definitions

1.1 Legionella Management Responsibilities

The management of legionella within Trust's premises lies within each school's leadership team.

1.2 Training overview

A Training overview will describe and formulate the training needs required by a team or an individual. It will examine the tasks undertaken and describe the training required.

1.3 Legionella/ Legionnaires Disease

- 1.3.1 Legionnaires disease is a form of pneumonia that principally affects those members of the general population who are susceptible due to age, illness, immunosuppression drugs, smoking, etc., and may be fatal. Legionella can also cause less serious illnesses, which are not fatal or permanently debilitating but which can affect all peoples.

Legionella pneumonia, the bacterium responsible for Legionnaires disease, is widespread in natural sources of water and causes no problem. However, the bacterium may enter man-made systems or water services and under ideal growth conditions, and where there is a means of aerosol formation and a susceptible population, an outbreak may take place.

1.4 Health and Safety Lead

- 1.4.1 The Health and Safety is charged with the responsibility and duty to effectively control the risk from legionella bacteria in the school's water systems.

- 1.4.2 The Health and Safety lead's duties and responsibilities include:

- Implementation and the continuing review of this procedure.
- Ensuring that all staff within the school are kept fully informed of developments in legislation and good practices relating to the management of legionella;
- Ensuring competent staff are employed in delivering the procedure
- Ensuring that the 'Duty of Care' to our employees and contractors is robust.

- Ensure via appointed staff responsibility for the day to day delivery of the process and continuing audit.
- Approved contractors are available to undertake surveys/ risk assessments upon request/demand.
- To ensure surveys are undertaken as and when this procedure dictates.
- That the Legionella register is kept up to date with additional or extra surveys as dictated by this procedure.
- Organising a practical prioritised programme of chlorination/ Bylaw 30 works. Those areas offering the greatest risk will be treated first. Any new discoveries will either be added to the schedule or treated separately.
- Carrying out training needs analysis for the relevant staff
- Maintaining the Asset Database and Legionella Register
- Ensuring that the Asset Database is regularly updating the in-house management system.

1.4.3 Site services

- Organise quarterly/ six monthly checks as detailed in Section 1.9 - Monthly Regimes
- To update site log book with information gathered during quarterly/ six monthly checks
- To note any remedial works required to the domestic water system. And to bring these to the attention of the responsible person.
- To attend training updates as and when required.
- Carry out weekly/ monthly checks as detailed in Section 1.9 – Monthly Regimes
- To update site log book with information gathered in weekly/ monthly checks.
- To bring to the attention of the responsible person any anomalies with regards water temperatures during checks

1.5 Legionella Risk Assessment

- 1.5.1 A risk assessment shall be undertaken of all water storage tanks, calorifiers and associated pipework which are susceptible to colonisation by Legionella. The risk assessment shall follow the procedure L8 (2000) and the Approved Code of Practice for the prevention of Legionella. It should take into account the following:

- Temperature of stored water, eg, tanks, calorifiers, water heaters with header tanks etc.
 - Construction and dimensions of water storage tanks, calorifiers etc.
 - Internal condition of water storage tanks and calorifiers (if possible)
 - If tanks are Bylaw 30 compliant, eg, screened overflows, insulation, lids
 - Configuration of pipework to prevent water stagnation
 - Deadlegs in the pipework distribution system
 - Condition of showers and showerheads
 - Water temperatures at hot and cold outlets after specified running times
 - Are drinking water labels installed to incoming mains
 - Microbiological samples (TVC)
- 1.5.2 Total Viable Cell Counts (Dip Slides) shall be taken during each risk assessment. If and when Legionella water samples are required, the contractor shall obtain 2no. one litre water samples in a sterile container, one from the hot water distribution system and one from the cold water distribution system. The samples to be sent away to an independent UKAS accredited laboratory for analysis within 48 hours.
- 1.5.3 On completion the risk assessment should include identification and evaluation of potential sources of risk and the particular means by which exposure to legionella bacteria is to be prevented. Or if prevention is not reasonably practical, the particular means by which the risk from exposure to legionella bacteria is to be controlled.
- 1.5.4 Under guidance from the Approved Code of Practice (L8) it is important that the risk assessment is reviewed at least every two years and updated continually.

1.6 Risk Assessment Results/ Remedial Works

- 1.6.1 The completed risk assessment will make recommendations as to remedial works required to the domestic water system in order to comply with the Approved Code of Practice. Examples of remedial works can include:
- Replacement tanks required
 - Sterilisation/ Chlorination of system required - Bylaw 30 works to be carried out, including:
 - Insulation to pipework/ tanks
 - Indicator labels to pipework
 - Ball valve moved to opposite side of tank to allow crossflow of water
 - Rodent screens to overflow pipes
 - Lid vents to be fitted
- 1.6.2 These recommendations are prioritised as high, medium or low with associated time scales as to when the work should be completed. These time scales are:
- | | |
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| High Priority | Work to be carried out immediately. (Where this is not possible, regular disinfection and temperature monitoring regime to be adopted until period of rectification) |
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Medium Priority Within three months

Low Priority Within twelve months

- 1.6.3 The purpose of this work prioritisation is to indicate to the building owner and the Responsible Person an approximate time scale for monitoring, maintaining and executing remedial works to the domestic water system

1.7 Chlorination/ Sterilisation Work Practices

- 1.7.1 Water services shall be chlorinated/ sterilised for any of the following reasons:

- New installations before being taken into use to remove contamination which may have occurred during construction
- If a routine inspection shows it necessary
- If the system or part of it has been substantially altered for maintenance purposes in a manner that may lead to contamination.
- Following an outbreak or suspected outbreak of legionellosis or any other water borne infection/ disease

- 1.7.2 All chlorination work shall be carried out in accordance with BS6700

- 1.7.3 All chlorination certificates should be added into the on-site log book within 28 days of test being taken, with photocopies being forwarded to the responsible person

1.8 Record Keeping

- 1.8.1 The Risk assessment will contain the following information:

- Full site address
- Name of site contact (Managerial)
- Name of risk assessor and the company name
- Name of responsible person
- Date of assessment
- Photographic evidence of any pipework defects, condition of water tanks, calorifiers
- Details of microbiological sample results
- Detail of operation, relevant to controlling the risk
- Controls to be implemented complete with schedule

- 1.8.2 A copy of the risk assessment shall be given to the School leadership team to be put on file.

1.9 Monitoring

- 1.9.1 Monitoring shall be carried out as prescribed by HSC L8 (2000)

- 1.9.2 On completion of the risk assessment a monitoring regime will be agreed. All results from the monitoring regime shall be inserted into the site log book.
- 1.9.6 Schools shall have personnel who have been instructed, trained and who are competent to carry out the weekly, monthly and quarterly monitoring regime.
- 1.9.7 Water sampling and tasks requiring engineering skills shall be done by an approved contractor
- 1.9.8 The table indicates the monitoring regimes in place. Suitable training and equipment will be provided to ensure the works are carried out correctly and safely.

MONITORING REGIME TIMESCALES

SERVICE	TASK	FREQUENCY	CARRIED OUT BY
HOT WATER SERVICE	Arrange for samples to be taken from hot water calorifiers, in order to note condition of drain water	Annually	Water Treatment Contractor
	Visual check on internal surfaces of calorifiers for scale and sludge. Check representative taps for temperature above 50C on a rotational basis	Annually	Water Treatment Contractor
	Check temperatures in flow and return at calorifier	Monthly	Site Services
	Check water temperature up to one minute to see if it has reached 50C in the sentinel taps	Monthly	Site Services
COLD WATER SERVICE	Visually inspect cold water storage tanks and carry out remedial work where necessary. Check representative taps for temperature below 20C on a rotational basis	Annually	Water Treatment Contractor
	Check tank water temperature remote from ball valve and mains temperature at ball valve. Note maximum temperatures recorded by fixed max/ min thermometers where fitted	Six Monthly	Water Treatment Contractor
	Check that temperature is below 20C after running taps for up to two minutes in the sentinel taps	Monthly	Site Services

SHOWER HEADS	Dismantle, clean and descale shower heads and hoses	Quarterly	Site Services
LITTLE USED OUTLETS	Flush through and purge to drain, or purge to drain immediately before use without release of aerosols	Weekly	Site Services
COMPLETE SYSTEMS	Physically clean and disinfect all cold water storage tanks, calorifiers and associated hot and cold water services	Annually	Water Treatment Contractor

1.10 Monitoring Escalation

- 1.10.1 During monthly testing of water temperatures, if temperatures are not in line with set parameters then this is to be reported to the Health and Safety Lead.
- 1.10.2 A plumber/ heating engineer should attend as an emergency job to ascertain the problem and carry out remedial works.
- 1.10.3 If works required are above and beyond that of site services then the Head of School/ Headteacher to be informed who will then ascertain competitive quotes for remedial works.
- 1.10.4 After completion of remedial works, by site services or external contractor, temperatures to be re-taken and recorded in log book
- 1.10.5 Any other remedial works identified during quarterly, six monthly or annual inspections will fall into the time categories detailed in section 1.6.5

1.11 Specialist Legionella/ Water Treatment Companies

- 1.11.1 Only specialist legionella/ water treatment contractors registered with and licensed by the Health and Safety Executive (HSE), and will be permitted to complete works on the Trust's premises.

1.12 Auditing

- 1.11.1 It is essential that the 'responsible person' shall carry out continuing auditing of all log books on sites and the monitoring of all risk assessments being carried out
- 1.11.2 After all risk assessments have been completed and the monitoring programme is established, the records shall be continually updated in accordance with the programme for the individual site and all information shall be kept in an accessible for auditing.
- 1.11.3 The risk assessment and log book will be reviewed a minimum of once every two years.

2.0 Safe System of Work

It is the duty of all those involved in the management of legionella, or those whose normal work pattern may lead to exposure to legionella, to comply with the Legionella Management Policy, Legionella Management Operational Procedure, current legislation and other applicable rules and regulations. Failure to comply may lead to disciplinary action.

3.0 Communication Regime

- 3.1 The Health and Safety lead is responsible for co-ordinating all surveys/ risk assessments

4.0 Training

- 4.1 Responsibility for Legionella training rests with the School Leadership team, who will ensure:

- 4.2 The completion of a Training Needs Analysis is essential. The training will be delivered to all relevant staff within six months of the adoption of this Operational Procedure and will be subject to an annual review.

- All those who potentially may have day-to-day contact with legionella will be fully trained to external industry standards;
- Those with management duties or those who are likely to be exposed to legionella are kept fully informed of new developments;
- Training in all aspects of legionella management is cascaded to all levels of staff.

5.0 Funding

- 5.1 Funding will be made available as follows:

- Discovery of legionella bacteria, requiring emergency cleaning and making safe. The work to be immediately procured.

6.0 Sources of information

The Control of Legionella Bacteria in Water Systems: Approved Code of Practice & Guidance: L8

HSE Guidance - Controlling Legionella in Nursing & Residential Care Homes

HSE Guidance - The Control of Legionellosis including Legionnaires Disease

HMSO Publication - Health and Safety at Work etc Regulations 1999.