



Legionella Policy

Policy Owner: Lets Make Change

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Approved by: Joseph Fitzpatrick

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1.0	20/05/26	Joseph Fitzpatrick	Initial policy created	Joseph Fitzpatrick	May 2027

Let's Make Change (LMC)

Legionella Policy

1. Policy Statement

Letsmakechange (LMC) is committed to providing and maintaining a safe and healthy environment for all young people, employees, visitors, contractors and other individuals who access LMC premises.

LMC recognises the potential health risks associated with Legionella bacteria and will take all reasonably practicable measures to identify, assess, prevent and control the risk of exposure to Legionella from water systems within premises for which LMC has responsibility.

LMC will ensure that appropriate Legionella risk assessments, control measures, monitoring arrangements and records are maintained in accordance with relevant health and safety legislation and guidance.

2. Purpose

The purpose of this policy is to establish clear arrangements for identifying and managing the risk of exposure to Legionella bacteria within LMC premises.

The policy aims to ensure that:

- Legionella risks associated with LMC water systems are identified and appropriately assessed.
- Suitable measures are implemented to prevent or control identified risks.
- A competent person is appointed where required.
- Water systems are appropriately maintained and monitored.
- Little-used water outlets are appropriately managed.
- Appropriate records are maintained.
- Staff understand how to report concerns regarding water systems.
- Contractors carrying out Legionella-related work are appropriately competent.
- Appropriate action is taken where monitoring identifies concerns or where Legionella contamination is suspected.

3. Scope

This policy applies to all premises, facilities and water systems for which LMC has management or health and safety responsibilities.

It applies to:

- young people accessing LMC provision;
- employees;
- agency and temporary staff;
- volunteers;
- visitors;
- contractors;
- parents and guardians while visiting LMC premises; and
- any other person who may reasonably be affected by LMC's activities.

Where LMC occupies premises managed by a landlord, property owner or another organisation, LMC will establish and document who is responsible for the management, maintenance and monitoring of the water system.

4. What is Legionella?

Legionella bacteria can occur naturally in water and may multiply within man-made water systems where conditions allow.

Legionnaires' disease is a potentially serious form of pneumonia. Infection can occur when a person inhales small droplets of water containing Legionella bacteria.

Water systems may present an increased risk where conditions include:

- water temperatures that support bacterial growth;
- stored or recirculated water;
- stagnant water;
- scale, rust, sludge, sediment or biofilm;
- outlets or equipment capable of creating water droplets or aerosols, such as showers; and
- sections of the water system that are used infrequently.

LMC recognises that some individuals may be more susceptible to infection and will take this into consideration when assessing and managing risks.

5. Legal and Regulatory Framework

LMC will manage Legionella risks with reference to applicable UK legislation and guidance, including:

- Health and Safety at Work etc. Act 1974;
- Management of Health and Safety at Work Regulations 1999;
- Control of Substances Hazardous to Health Regulations 2002 (COSHH);

- HSE Approved Code of Practice L8 – *Legionnaires' disease: The control of Legionella bacteria in water systems*; and
- HSE HSG274 – *Legionnaires' disease: Technical guidance*, particularly Part 2 relating to hot and cold water systems.

LMC will review this policy where relevant legislation, statutory guidance or recognised good practice changes.

6. Responsibilities

Senior Management

LMC senior management has overall responsibility for ensuring that appropriate arrangements are in place for managing health and safety risks, including risks associated with Legionella.

Management will ensure that:

- suitable Legionella risk assessments are completed;
- responsibilities are clearly allocated;
- competent advice is obtained where required;
- appropriate resources are made available;
- identified remedial actions are completed within appropriate timescales; and
- suitable monitoring and record-keeping arrangements are maintained.

Responsible Person

LMC will identify a suitably competent **Responsible Person** to oversee the management of Legionella risks.

The Responsible Person will:

- understand the relevant water systems;
- ensure that appropriate risk assessments are undertaken;
- implement any required written control scheme;
- coordinate monitoring, inspection and maintenance;
- ensure required actions are completed;
- maintain appropriate records;
- arrange specialist advice or testing where required;
- ensure relevant staff understand their responsibilities; and
- review control measures and risk assessments when necessary.

Where external contractors are used, LMC will satisfy itself that they have appropriate competence, knowledge and experience.

The appointment of a contractor does not remove LMC's responsibility to ensure that suitable control arrangements are in place.

7. Legionella Risk Assessment

LMC will ensure that a suitable and sufficient Legionella risk assessment is undertaken for relevant premises and water systems.

The assessment will consider, where applicable:

- the design and condition of the water system;
- hot and cold water systems;
- water storage;
- water temperatures;
- showers and other aerosol-producing outlets;
- little-used outlets;
- redundant or dead-leg pipework;
- periods during which premises or parts of premises are unoccupied;
- potential sources of stagnation;
- scale, corrosion, sludge or biofilm;
- maintenance arrangements;
- people who may be particularly susceptible to infection; and
- existing preventative and control measures.

The assessment will identify whether further control measures are required and who is responsible for completing them.

8. Review of Risk Assessments

Legionella risk assessments will be reviewed periodically and whenever there is reason to believe that an existing assessment may no longer be valid.

A review may be required following:

- changes to the water system;
- significant building alterations;
- changes in how premises are used;
- prolonged periods of closure or reduced occupancy;
- significant changes in the population using the premises;
- concerns regarding water temperatures or water quality;
- failure of existing control measures;
- relevant changes to legislation or guidance; or
- a suspected or confirmed case of Legionnaires' disease associated with the premises.

LMC will not rely solely upon a fixed review date where circumstances indicate that an earlier review is required.

9. Control Measures

Where Legionella risks are identified, LMC will implement proportionate controls based on the findings of the risk assessment and advice from a competent person.

Controls may include:

- maintaining appropriate hot and cold water temperatures;
- avoiding unnecessary water storage;
- preventing water stagnation;
- maintaining adequate water circulation;
- regularly using or flushing little-used outlets;
- removing redundant pipework where appropriate;
- keeping water systems clean and appropriately maintained;
- controlling scale, corrosion, sediment and biofilm;
- maintaining and cleaning showerheads and hoses;
- inspecting water storage tanks where applicable;
- maintaining boilers, calorifiers and other relevant equipment; and
- arranging specialist cleaning, disinfection, sampling or treatment where required.

The exact control programme for each LMC location will be determined by its Legionella risk assessment and the nature of the water system.

10. Water Temperature Management

Temperature control may form an important part of LMC's Legionella control arrangements.

Where temperature is used as a control measure, the required parameters and monitoring arrangements will be established through the Legionella risk assessment and in accordance with current HSE guidance.

LMC will ensure that temperature controls take account of both Legionella prevention and the risk of scalding, particularly where young people or vulnerable individuals may use water outlets.

Where thermostatic mixing valves or other safety devices are installed, they will be appropriately maintained and included within relevant inspection and maintenance arrangements.

11. Little-Used Outlets and Stagnation

Water stagnation can increase the opportunity for Legionella bacteria to multiply.

LMC will identify outlets that are infrequently used, which may include:

- sinks;
- showers;
- toilets;
- external taps;
- unused rooms;
- changing facilities; and
- facilities that are temporarily out of use.

Where required by the risk assessment or control scheme, these outlets will be flushed at an appropriate frequency.

Flushing will be undertaken in a manner that minimises the creation of aerosols and unnecessary exposure.

Records of flushing will be maintained where this forms part of the control scheme.

Where an outlet is no longer required, LMC will consider whether it and any associated redundant pipework should be removed by a competent person.

12. Premises Closure and Reopening

Additional precautions will be considered where an LMC building, room or water system has experienced prolonged periods of little or no use.

Before reopening an affected area, LMC will consider whether:

- outlets require flushing;
- temperature checks are necessary;
- the system requires inspection;
- cleaning or disinfection is required; or
- specialist advice should be obtained.

The appropriate measures will depend on the water system, length of closure and findings of the Legionella risk assessment.

13. Showers and Other Aerosol-Producing Equipment

Showers and other equipment capable of producing fine water droplets will be included within Legionella risk assessments.

Where required, showerheads, hoses and associated equipment will be:

- regularly inspected;
- cleaned;
- descaled; and

- disinfected at intervals appropriate to the risk assessment and manufacturer's instructions.

Any shower or outlet that has remained unused for a significant period will be managed in accordance with the site's control arrangements before normal use resumes.

14. Monitoring and Inspections

The Responsible Person will ensure that monitoring identified within the site's Legionella control arrangements is completed.

This may include:

- temperature monitoring;
- checking little-used outlets;
- inspection of water storage systems;
- inspection and maintenance of water heaters;
- checking for scale, corrosion or contamination;
- showerhead cleaning and descaling;
- checking that remedial works have been completed; and
- specialist sampling where this is identified as necessary.

Monitoring frequencies will be based upon the site's risk assessment, water system and current HSE guidance rather than applying a single frequency to every LMC location.

15. Legionella Sampling

Routine microbiological testing for Legionella is not automatically required for every hot and cold water system.

Sampling will be undertaken where indicated by the risk assessment, control scheme, specialist advice or current HSE guidance.

Where sampling is necessary, LMC will use appropriately competent contractors and laboratories.

Results will be reviewed by the Responsible Person and appropriate remedial action taken where required.

16. Staff Responsibilities

All staff have a responsibility to support LMC in maintaining safe premises.

Staff should report concerns including:

- water that does not appear to heat correctly;
- unusually warm cold water;
- discoloured or unusual-smelling water;
- damaged taps or showers;
- leaks;
- excessive scale;
- outlets that are rarely or never used;
- water storage concerns; or
- any other issue that may affect water safety.

Staff must not make unauthorised adjustments to water heaters, boilers, thermostats or other water-system controls.

Any concern should be reported promptly to the Responsible Person or designated manager.

17. Contractors

Where LMC appoints contractors to carry out Legionella risk assessments, monitoring, water treatment, maintenance, sampling or remedial works, LMC will take reasonable steps to ensure that the contractor is competent to undertake the required work.

Contractors will be expected to:

- work in accordance with relevant legislation and guidance;
- provide suitable documentation;
- report identified risks or defects promptly;
- provide monitoring and test results where applicable;
- provide evidence of remedial work undertaken; and
- cooperate with LMC's Responsible Person.

18. Record Keeping

LMC will maintain appropriate Legionella management records.

These may include:

- Legionella risk assessments;
- details of the Responsible Person;
- written control schemes;
- monitoring schedules;
- water temperature records;
- flushing records;

- inspection records;
- maintenance records;
- showerhead cleaning/descaling records;
- contractor reports;
- sampling and laboratory results;
- remedial action records;
- staff or contractor training records; and
- risk assessment reviews.

Records will be stored securely and made available to authorised persons when required.

19. Suspected Legionella Contamination

Where monitoring, testing or other information suggests that a water system may not be adequately controlled, LMC will take prompt action.

Depending upon the circumstances, this may include:

1. restricting access to affected outlets or equipment;
2. informing the Responsible Person and senior management;
3. obtaining advice from a competent Legionella specialist;
4. arranging appropriate sampling where advised;
5. arranging cleaning and disinfection;
6. investigating the reason for the control failure;
7. completing required remedial works;
8. reviewing the Legionella risk assessment and control scheme; and
9. documenting all actions taken.

Affected water systems or outlets will only be returned to normal use when LMC is satisfied that it is safe and appropriate to do so.

20. Suspected or Confirmed Case of Legionnaires' Disease

If LMC becomes aware of a suspected or confirmed case of Legionnaires' disease that may be connected with an LMC premises, the matter will be treated seriously and escalated immediately to senior management and the Responsible Person.

LMC will:

- seek appropriate specialist advice;
- cooperate with the relevant enforcing authority and public health bodies;

- preserve relevant water-management records;
- follow instructions regarding sampling or investigation;
- restrict access to relevant water systems where advised;
- undertake required remedial action; and
- review the Legionella risk assessment and control arrangements.

Any statutory reporting requirements will be considered and completed where applicable.

21. Information, Instruction and Training

LMC will ensure that employees with responsibilities for Legionella management receive appropriate information, instruction and training.

The level of training will be proportionate to the individual's responsibilities.

The Responsible Person must have sufficient knowledge, competence and authority to carry out their role effectively.

General staff will be informed of relevant responsibilities, particularly the requirement to report water-system concerns promptly.

22. Young People and Vulnerable Individuals

LMC recognises its responsibility to provide safe environments for the young people accessing its services.

Where a young person's health or other circumstances may make them particularly susceptible to infection, relevant risks will be considered as part of LMC's wider health and safety and individual risk-management arrangements.

Any sensitive personal information will be managed in accordance with LMC's confidentiality and data-protection arrangements.

23. Compliance

Failure to follow this policy may place young people, staff and others at risk.

Employees who fail to follow reasonable health and safety instructions may be managed in accordance with LMC's relevant internal procedures.

Contractors who fail to meet required health and safety standards may have work stopped and may be subject to review before undertaking further work for LMC.

24. Policy Monitoring and Review

This policy will be reviewed at least annually as part of LMC's policy review arrangements and sooner where:

- legislation or HSE guidance changes;
- significant changes are made to LMC premises or water systems;
- an incident or control failure occurs;
- a Legionella risk assessment identifies significant changes; or
- management considers an earlier review necessary.

Operational Legionella risk assessments will additionally be reviewed whenever there is reason to believe that they are no longer valid.