



Legionella Management Policy

Policy owner: Mark Anderson (Head of Centre)

Organisation: Nurture Education Trust

Review cycle: Annual

Last reviewed on: 01/09/2026

Next review due by: 01/09/2027

Aims

This is the Legionella Policy for Nurture Education Trust. It is a legal requirement defined within

This policy has been developed in accordance with the Health and Safety Executive Approved Code of Practice (ACOP) L8, Legionnaires' Disease: The Control of Legionella Bacteria in Water Systems (4th Edition, 2013), associated HSG274 guidance, the Health and Safety at Work etc. Act 1974 and the Control of Substances Hazardous to Health Regulations 2002 (COSHH).

The aims of this policy are as follows:

- To ensure adequate and appropriate management arrangements exist for controlling Legionella.
- To ensure that the school has adequate, safe, and effective Legionella management for every student, member of Staff and visitor to remain well.
- Where an identified risk cannot be prevented, prepare, implement, and manage a written control scheme (or course of action) for controlling the risk
- Keep records and check that what has been done is effective
- Ensure resources are made available to achieve compliance
- Ensure all those personnel involved in the management of legionella risks are appropriately informed, instructed, and where necessary, trained and supervised
- To ensure that all Staff are aware of the procedures in the event of a Legionella outbreak.

Scope and application

- This policy applies to the whole School
- This policy always applies when the school is fully operational.
- When the school is not fully operational, a scaled down approach as dictated in this policy will be applied.

Regulatory framework

This policy has been prepared to meet the school's responsibilities under:

- Education (Independent School Standards) Regulations 2014
- Education and Skills Act 2008
- Children Act 1989
- Childcare Act 2006

- Equality Act 2010
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.
- Data Protection Act 2018 and UK General Data Protection Regulation (GDPR).
- Health and Safety at Work etc. Act 1974
- Health and Safety (First-Aid) Regulations 1981.

This policy has regard to the following guidance and advice:

- Health and Safety Executive www.hse.gov.uk
- HSE Legionnaire's Disease Code of Practice L8 4. edition, 2013
<http://www.hse.gov.uk/pubns/priced/l8.pdf>
- Legionnaire's Disease – A Guide for Duty Holders Leaflet, INDG458 HSE Books 2012 <http://www.hse.gov.uk/pubns/indg458.htm>
- Reporting accidents and incidents at work: A brief guide to the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) Leaflet, INDG453(rev1) HSE Books 2013
<http://www.hse.gov.uk/pubns/indg453.htm>
- Control of substances hazardous to health (COSHH). The Control of Substances Hazardous to Health Regulations 2002 (as amended).
- Approved Code of Practice and guidance L5 (6. edition)
<http://www.hse.gov.uk/pubns/books/l5.htm> 3.9 Health and Safety at Work etc Act 1974 (c.37)

Publication and availability

- This policy is published on the school website and available in hard copy on request.
- A copy of the policy is available for inspection from school reception during the school day and can be made available in large print or another accessible format if required.

Definitions

Where the following words or phrases are used in this policy:

- References to the Proprietor are references to Nurture Education Trust Trustees
- References to Staff means any person employed by the school, volunteers at the school and self-employed people working on School premises.
- References to Legionella means a potentially dangerous type of bacteria, which grows best in warm, nutrient rich water (including domestic water systems).
- References to a Legionella Risk Assessment (LRA) means a specialist type of risk assessment carried out by a water quality specialist
- References to the Responsible Person (RP) who manages schools / premises refer to a locally appointed person (internal member of staff) who has 'control' of the building and its facilities and who is appointed by the school to perform water checks and to record these in the Water Management Logbook,.
- References to the Logbook mean a record book used to record all local checks and tests carried out e.g., hot water temperatures, descaling of showers and weekly flushing of infrequently used water outlets.

- References to a TMV are references to Thermostatic Mixing valves.

Background

Legionella bacteria are naturally present in the environment and if water conditions are favourable to the bacteria i.e., 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.

Responsibility statement and allocation of tasks

The Proprietor has overall responsibility for all matters which are the subject of this policy.

To ensure the efficient discharge of its responsibilities under this policy, the Proprietor has allocated the following tasks:

Task	Allocated to	When / frequency of review
Keeping the policy up to date and compliant with the law and best practice	Mark Anderson Head of Centre	As required, and at least annually
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness	Mark Anderson Head of Centre	As required, and at least termly
Seeking input from interested groups (such as students, staff, parents) to consider improvements to the School's processes under the policy	Mark Anderson Head of Centre	As required, and at least annually
Formal annual review	Proprietor	Annually (at Trustee meeting and discussion/report on Health and Safety provided by a Trustee following supportive visit.

This Policy should not be considered a definitive guide to the management of legionella and the requirements of the Regulations. Where any doubt exists as to the action to be taken, or advice or assistance is required, contact should be made with the Head of Centre.

Recommended Legionella Control Programme

Action Advised Y/N Frequency

Monitoring and recording of Hot and Cold Outlet Temperatures	Yes	Monthly
Showerhead Descale & Disinfection	Yes	Quarterly (Minimum)
Low-use Outlet Flushing	Yes	Weekly
Low-use Shower Flushing	Yes	Weekly
Legionella Sampling	Yes	Annually
Descaling & Disinfection of Taps	Yes	As Required
TMV Servicing & Failsafe Checks	Yes	Annually

Risk assessment

A legionella risk assessment (LRA) will be undertaken for the Nurture Education Trust school premises giving details of the buildings' water systems. These documents will enable the LRA to be reviewed by either the Responsible Person or Risk Assessor on an annual basis. Premises which have a low-risk water system, where the risk assessment has identified as insignificant risk, are unlikely to need any further measures after completion of the LRA. 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.'

If the LRA identifies that the water system does not store water between the temperatures of 20oC and 50oC then only monitoring will be needed to ensure that this control continues to be in place. If the LRA identifies the need for ongoing monitoring, then results will need to be recorded in the Water Management Logbook.

Reviews of risk assessments will take place when:

- There are changes to the water system or its use
- There are changes to the use of the building in which the water system is installed
- New information about risks or control measures become available
- The results of checks indicating that control measures are no longer effective. A case of legionnaires' disease/Legionellosis is associated with the system.

Calorifiers and Water Heaters

Some form of scale control is desirable in hard water areas. The use of point - of - use hot water generators, with minimal or no storage for remote low - use outlets should be considered. The storage capacity and recovery rate of the calorifier should be selected to meet the normal daily fluctuations in hot water use without any drop in the supply temperature. The vent pipe from the calorifier which allows for the increase in volume of the water circuit, to prevent hot water being discharged. However, if discharged, the water should go to a tundish.

Where more than one calorifier is used, they should be connected in parallel and if temperature is used as a means of control, each should deliver water at a temperature of at least 60oC. All calorifiers should have a drain valve located in an accessible position at the lowest point of the vessel so that accumulated sludge can be drained easily, and the vessel emptied in a reasonable time. A separate drain should be provided for the hot water system vent (particularly if the feed to the calorifier incorporates a non-return valve).

If temperature is used as the means of controlling legionella, the hot water circulating loop should be designed to give a return temperature to the calorifier of 50oC or above. The pipe branches to the individual hot taps should be of sufficient size to enable the water in each of the hot taps to reach 50oC within 1 minute of turning on the tap. Thermometer/immersion pockets should be fitted on the flow and return to the calorifier and in the base of the calorifier in addition to those required for control.

In larger calorifiers, the fitting of time-controlled shunt pumps should be considered to overcome temperature stratification of stored water. Hot water distribution pipes should be insulated. If temperature is used as a means of controlling legionella, trace heating should be provided on non- circulatory hot water distribution pipe work where the discharge temperature would not otherwise reach 50oC in 1 minute.

Task	Frequency
Drain & arrange for samples to be taken from hot water calorifiers, to note condition of drain water	Annually
Drain & conduct a visual check on the internal surfaces of calorifiers. for scale & sludge.	Annually
Check temperatures of flow and return at calorifiers	Monthly
Check temperatures of flow of water heaters	Monthly

Thermostatic mixing valves (TMVs) – the installation of TMVs should be informed by a risk assessment. Depending on the asset which the TMV is serving, then water temperature should be regulated to 41°C +/- 2°C to mitigate scald risk. However, this falls within temperature range that encourages the growth of waterborne bacteria (20-45°C) and therefore these risk systems should be dismantled, cleaned, disinfected and functional checks at least annually.

Staff Training

Training for staff responsible for premises and for managing the risk of legionella under this policy will be provided as part of the E-learning Educare programme. Staff responsible for premises must ensure the

Competent Person nominated to perform temperature checks etc. fully understands the instructions provided.

Records of training will be held centrally in the main school office.

Record keeping

All records created in accordance with this policy are managed in accordance with the School's policies that apply to the retention and destruction of records.

Where there are specific record keeping requirements under this policy, these are set out below:

The records created in accordance with this policy may contain personal data. The school has several privacy notices which explain how the school will use personal data. The school's approach to data protection compliance is set out in the Data Protection Policy. Staff must ensure that they follow the school's data protection policies and procedures when handling personal data created in connection with this policy.

Legionella Water Management Logbook Guidance

Introduction

This guidance has been prepared to support the effective use of the Legionella Water Management Logbook in order to comply with the Approved Code of Practice "The Control of Legionella bacteria in water systems," 2013.

The required actions to control the risk from Legionella are assigned to the responsible person and secondary competent trained staff delegated by the Head of Centre. The LRA and water services within the premises will determine the frequency of visits and tasks required to be carried out under these regulations (if any), and adaptations may need to be made to the logbook tables.

Thermometers

To check water temperatures, the school purchases and maintains a basic thermometer suitable for checking water temperatures range 0°C - 100°C e.g., digital probe thermometer. To ensure the thermometer remains accurate you should calibrate this monthly. The simplest way to do this is to use boiling water and crushed ice water to check 100°C and 0°C, respectively. Adjust accordingly and keep records. If more than 1°C out, then a new thermometer will be purchased.

Completing and recording water temperatures

Water temperature record sheets need to be filled in and kept within the logbook. If required, it is usual to spread this over the 12 months, i.e., if you have 24 taps you need to sample 2 per month. Outlets failing to meet the required temperature should be reported for suitable action and retested in subsequent months until satisfactory. Hot Water should be at least 50oC after 1 minute and cold water below 20oC after 2 minutes flow.

Flushing infrequently used taps and showers

Hot or warm water left in pipes for extended periods can allow Legionella bacteria to multiply presenting a risk when finally discharged e.g., school showers after summer holidays. Identify infrequently used taps and showers on the 'Weekly record sheet' and record when flushing takes place. Flush each tap/ shower for several minutes to ensure stagnant water is fully discharged. Flush all sentinel taps monthly.

Hot and Cold-Water Temperature Monitoring

Where necessary, a schedule for precautionary checks on hot, cold water taps and showers (where there is water storage) should be implemented. The responsible person should organise checks to be carried out at the frequencies indicated below. Where the temperatures fall outside the standards actions should be taken to resolve the problem.

Weekly Checks

Showers: that are not in use for over a one-week period must be flush from 2 minutes at both maximum and minimum temperature. A plastic bag should be secured over shower head with corner cut off to allow water to escape.

Monthly Checks

Taps: Temperature of all cold-water sentinel taps to check that water is below 20°C.

Run cold tap for 2 minutes then measure temperature by inserting calibrated digital thermometer in the water flow and record reading.

Temperature of all hot water taps to be taken to check TMV anti-scalding is working.

Main pipe before TMV to be checked to ensure that water is above 60°C.

Run hot tap for 1 minute then measure temperature by inserting calibrated digital thermometer in hot water flow and record reading.

Actions in the event of negative temperature monitoring checks

In the event of a negative temperature test result being noted, (i.e., either Hot water below 60c or cold above 20c) by the Responsible person, the following actions should be carried out.

If hot water:

- The boiler settings need to be reviewed to ensure that the temperature can be raised.
- Further additional temperature checks should be made after 48 hours to ensure that the problem does not persist.
- If the temperature cannot be raised to the required level, then further action needs to be taken to ensure the boiler is serviced / checked.

If cold water:

- Then the situation should be monitored more closely for a period for a 48hr period.
- If the temperature remains above the required 20c then further advice needs to be sought.

In either case if monitoring indicates an ongoing issue then the water supply must be examined/ tested by a suitably qualified contractor to ensure that the Legionella risk is managed. If a test of the water supply indicates that Legionella is present in high concentrations, then the following actions need to be carried out:

- Inform the Head of Centre, who will take relevant steps to ensure that the issue can be monitored.
- Shut down any processes which can generate and disseminating airborne water droplets and keep them shut down until remedial cleaning or other work has been done.
- Immediately arrange emergency disinfection to be undertaken if required.
- Depending on the client group or staff group that may have been exposed – monitor client / staff health to discern whether there are any undiagnosed cases of illness.

Health and Safety: Completion of the above checks presents minor risk to the health and safety of staff.

Hot and Cold-Water Systems Checklist

Use the checklists in the Water Management Logbook to keep up to date with water systems maintenance requirements for your site.

Please be aware that not all tables may be relevant. It is the responsibility of the designated person to ensure they are using all applicable checklists.

2026 Compliance Update

Duty Holder: The Trustees of Nurture Education Trust are the Duty Holder for legionella management and retain ultimate accountability for compliance.

Written Scheme of Control: The school shall maintain a documented scheme identifying water systems, schematics, sentinel outlets, monitoring frequencies, responsibilities, remedial actions and review arrangements.

Legionella sampling shall be undertaken on a risk-based basis as determined by the Legionella Risk Assessment and specialist advice.

Risk assessments shall be reviewed following significant system changes, control failures, building-use changes, or disease incidents, and formally reassessed at least every two years unless a competent assessor specifies otherwise.

The school shall maintain water system schematics, an asset register, monitoring records, remedial action records and contractor reports within the water hygiene logbook.

Legionella contractors must demonstrate suitable competence, training, qualifications and experience.

Legionella records shall be retained for a minimum of five years.

School closure and reopening procedures shall include flushing of outlets and verification of controls following prolonged periods of inactivity.