# Legionella Policy
# 2026

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ALDRIDGE EDUCATION

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## 1. Introduction and Purpose

1.1 Aldridge Education are committed to providing an environment, including water and engineering services provision, which is safe and without risks to the health, safety and welfare of its employees, learners, contractors, and visitors. Employees of Aldridge Education, and contractors engaged to work on their premises and water systems, plant and equipment must work with the Aldridge Education to safeguard their own health, safety and welfare and bring to Aldridge Education's attention any situation they are aware of which could pose a risk to their health, safety, or welfare of that of their colleagues, learners, or others.

1.2 The aims of this policy are to ensure that:

- The risks from the proliferation of legionella bacteria that may exist in water systems are identified, controlled, and managed, in accordance with the HSE document L8, to ensure that staff, learners, visitors, or passers-by are protected from the risks
- The requirements of The Health and Safety at Work Act etc. 1974, The Management of Health and Safety at Work Regulations 1999, The Control of Substances Hazardous to Health Regulations 2022 and the Approved Code of Practice, L8, are complied with
- Appropriately trained, technically competent and experienced staff are available and resourced to adequately manage water systems and associated legionella control
- Appropriate risk assessments and safe working practices are identified and followed by all contractors and sub-contractors

1.3 The Board of Trustees retains overall accountability for ensuring this policy is implemented effectively across all Aldridge Education settings. Operational responsibility is delegated to the Estates Director, Principals, and national team, in accordance with Aldridge Education's Scheme of Delegation.

1.4 Aldridge Education shall ensure the regular review and amendment of this policy, and its associated procedures, to maintain continued compliance with relevant regulatory requirements.

## 2. Scope, Definitions, Regulation and Linked Policies

### Scope

2.1 The Policy applies to all relevant activities involving water hygiene.

2.2 This policy and associated procedures applies across all Aldridge Education settings and all buildings and all individuals therein, without exception.

### Regulation and Linked Policies

2.3 Aldridge Education's Asbestos Policy conforms with the general requirements of:

- the Health and Safety at Work etc. Act 1974,
- The Management of Health and Safety at Work Regulations 1999,
- The Control of Substances Hazardous to Health Regulations 2022
- The Approved Code of Practice, L8,
- The School Premises (England) Regulations 2012, and
- the Academy Trust Handbook 2025.

2.4 Linked Aldridge Education policies

- Health and Safety Policy

## 3. Roles and Responsibilities

### The Trust Board

3.1 The Aldridge Education Trust Board has ultimate responsibility for health and safety matters, and therefore acts as the Duty Holder for Legionella management. Responsibility for undertaking aspects of these duties listed below are delegated through management, (Estates Director, Principals, Premises Managers). The Board will:

- Ensure this Policy is reviewed annually, or after any operational changes or significant legionella related incidents, to ensure that the provisions remain appropriate for the activities undertaken.
- Ensure that adequate resources, systems and competent persons are in place to support the safe management of water systems across Aldridge Education, in line with the Scheme of Delegation.
- Receive reports on legionella related incidents, training compliance, and identified risk trends to inform strategic oversight.
- Ensure that Aldridge Education meets its obligations under The Health & Safety at Work Act etc. 1974, the Academy Handbook 2025, including proper estate management, reporting to DfE, and compliance with The School Premises (England) Regulations 2012.

### The Estates Director

3.2 The Estates Director is responsible for ensuring that this Legionella Policy is implemented across all settings within Aldridge Education and that operational arrangements reflect requirements. The Estates Director will:

- Ensure that communication and reporting systems are in place so that legionella related incidents, near misses, and emerging risks are reported to the Board of Trustees.
- Where work involving water systems are centrally procured by Aldridge Education, the Estates Director shall ensure that contracted services comply with Aldridge Education's requirements and that contractors are appropriately vetted and monitored.
- Ensure mechanisms are in place to monitor the effectiveness of this policy.

3.3 Note that individual Principals remain responsible for the day to day implementation of this policy at their Setting.

### Principals

3.4 Principals are empowered to ensure that legislative requirements are met; and that testing, maintenance or repairs are initiated as required. Such powers are

supported by the necessary, sufficient, and appropriate resources, including funds. Principals shall fulfil the responsibilities of 'Duty Holder' on behalf of Aldridge Education, ensuring that:

- A 'Responsible Person' is appointed.
- Aldridge Education's policy on Legionella management is implemented and adhered to.
- Adequate resources and competent staff are available to effectively manage water systems
- Water system monitoring and review takes place
- Communication and coordination is maintained between all parties who work on water systems, plant, and equipment, this includes employed staff, consultant advisors and contractors, when identified by key staff.
- They take a lead role in a legionella outbreak situation and informing the Board of Trustees and Estates Director.
- Legionella related incidents, near misses, and concerns are recorded and reported via the Aldridge Education's designated reporting systems and escalated as required to the Board of Trustees.
- A suitable and sufficient risk assessment is carried out at their Setting to identify and assess the risk of exposure to Legionella bacteria from work activities and water systems under their remit.
- That a written scheme has been produced and implemented, where a reasonably foreseeable risk of exposure exists, for preventing or controlling the risks.
- That steps are taken to check equipment supplied for water systems are designed to minimise the growth of legionella bacteria and are installed and maintained in compliance with relevant water related regulations.
- That regular monitoring, inspecting, testing, e.g. water temperatures and Legionella bacteria levels testing, and reviewing of the water system's control measures, risk assessments and the written scheme to ensure that management procedures are working effectively
- That the risk of Legionella is eliminated, where reasonably practicable, through improved engineering design of water systems, e.g. by removing dead legs or removing unused showers where water can stagnate.
- That persons working with water systems are appropriately supervised and have been provided with suitable information, instruction and training including the significant findings of risk assessments.
- That regular cleaning, treating, maintaining, and operating of water systems at predetermined intervals.
- That the risks from scalding are minimised.
- That where relevant, the requirements of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations, (RIDDOR), are complied with.

- Records are retained for 5 years, records kept must consist of:
  - Appointed responsible people for conducting the risk assessment, managing, and implementing the written scheme
  - Significant findings of the risk assessment
  - Written scheme and its implementation
  - State of operation of the water system, (working or not).

## Regional Estates Managers

3.5 Regional Estates Managers shall undertake the role of 'Responsible Person' as defined in the HSE document L8 and shall ensure:

- That the Legionella policy is communicated to staff and complied with.
- The identification and assessment of the risk programme for the prevention of the proliferation of Legionella bacteria in the setting water system and, with the assistance of a competent person, carry out a risk assessment, develop a written scheme of control, seek and implement advice on prevention and control procedures.
- That Aldridge Education employed staff and budget holders are made aware of their responsibilities in relation to water system design and maintenance.
- That safe working procedures are in place taking advice as necessary so compliance can be maintained.
- Regular monitoring, inspection and testing of water system procedures.
- That a training programme is in place, in consultation with the Duty Holder.
- A deputy is appointed (usually the Premises Manager).
- That any significant safety breaches are reported to the Duty Holder.
- Records of monitoring, inspection, testing and work completed, (as per the water management risk assessment / Legionella survey), are kept and readily available for inspection.

## Premises Managers

3.6 Premises Managers are responsible for the day-to-day management on water systems, plant, and equipment and for Legionella reduction. They shall ensure:

- That all water system maintenance and alterations comply with HSE document L8 and other appropriate legislation.
- That all water system maintenance and alterations comply with this policy and any associated procedures.
- They are responsible for the coordination, inspection and monitoring of the water system on a monthly or a more regular basis if the need arises.

- Reporting to the Responsible Person any significant breaches immediately which need to be urgently rectified safely.
- They proactively resolve minor water system or legionella issues, if competent to do so.
- That appropriate records are maintained and updated, (internal and contractor checks), and that these are in line with the Legionella risk assessment findings.
- That appropriate persons are competent and trained to work on water systems.
- They report any resourcing issues to the responsible person which are required so that legal compliance can be maintained.
- They act as the deputy Responsible Person.

### All staff

3.7 All staff will ensure they:

- Cooperate with management arrangements for the control of Legionella in the workplace.
- Follow any information, training and instruction given by the employer to prevent ill health.
- Report to the Responsible Person any disease diagnosed as Legionnaires Disease.
- Report to the Responsible Person any hazardous or dangerous situations.

## 4. Legionella Arrangements

### Legionella Description

4.1 Legionellosis is a collective term for those diseases caused by Legionella bacteria, including the most serious, Legionnaires disease as well as the less serious Pontiac fever and Lochgoilhead fever.

4.2 Legionellosis can affect anyone who inhales small droplets of water, (aerosols), from water systems, e.g. showers that are contaminated with Legionella bacteria, however, principally affecting those who are susceptible due to age, illness, immune suppression, smoking etc. and may be fatal. Legionella is widespread in natural sources of water.

### Risk Factors of Legionella

4.3 The presence of Legionella bacteria. The conditions that encourage Legionella bacteria to multiply include poorly maintained systems, ineffective control measures, presence of rust, sludge, scale etc. and water temperatures between 20 – 40 °C.

4.4 The means of creating and disseminating breathable aerosols, e.g. from spas, showers, taps, fire sprinkler systems, water jets, hose pipes, fountains and hot water systems etc.

4.5 The person. The disease / fever can affect anyone, however some people are at higher risk than others e.g. those people over 50, smokers, heavy drinkers, diabetics, those with respiratory problems and immune system impairments.

## Training Requirements

4.6 In order for appointed persons to fulfil their responsibilities set out in this policy effectively appropriate training will be offered by Aldridge Education and undertaken by the relevant persons.

4.7 All relevant persons must undergo periodic refresher training in order to maintain awareness and knowledge required to fulfil their responsibilities set out in this policy

## Operation and Maintenance

4.8 To prevent the growth of Legionella bacteria the water system shall operate at the following temperatures:

- Cold water distribution and storage at 20 °C or below
- Hot water distribution at least 50 °C
- Hot water storage, (calorifiers), at 60 °C

4.9 Where there is a risk of scalding from taps at 50 °C, (e.g. to children or elderly), the use of thermostatically control mixing valves, (TMVs), should be used to allow water systems to run safely at higher temperatures

4.10 Thermostatic mixing valves shall be included within a planned maintenance and inspection regime to ensure they are maintained in good condition.

4.11 Where cold water storage tanks are present, they shall be inspected, cleaned and disinfected at planned intervals, as specified in the risk assessment.

4.12 All dead legs, infrequently used outlets, showers and taps shall be flushed according to the written scheme.

4.13 Monitoring of control measures, maintenance, and cleaning activities shall be recorded and retained in line with L8 requirements.

## Incident and Outbreak Management

4.14 Any suspected or confirmed case of Legionnaires' disease will be treated as a serious incident.

4.15 Where there is a suspected or confirmed case of Legionnaires' disease, the Responsible Person shall immediately:

- Inform the Principal
- Contact a competent person for specialist advice

4.16 Aldridge Education shall liaise with the Health and Safety Executive as required during a suspected or confirmed outbreak.

4.17 Where there is reasonable evidence that a case of Legionnaires' disease may be attributable to exposure from a Setting water system, Aldridge Education shall ensure that the incident is reported to the Health and Safety Executive under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).

### Further Guidance

4.18 Further guidance can be obtained from organisations such as the Health and Safety Executive (HSE) or Judicium Education. The following are some examples. The Health and Safety lead in Aldridge Education will keep under review to ensure links are current.

- HSE https://www.hse.gov.uk/
- HSE – Legionnaires' Disease. The Control of Legionella Bacteria in Water Systems. Approved Code of Practice L8. https://www.hse.gov.uk/pubns/priced/l8.pdf
- HSE – Legionnaires' Disease: A Brief Guide for Duty-Holders https://www.hse.gov.uk/pubns/indg458.pdf
- HSE – Legionella and Legionnaires' Disease https://www.hse.gov.uk/legionnaires/index.htm
- LCA – Legionella Control Association https://www.legionellacontrol.org.uk/

## 5. Monitoring and Review

5.1 The Legionella Policy will be reviewed in line with the policy review cycle, or after any operational changes or significant asbestos related incidents, to ensure that the provisions remain appropriate for the activities undertaken.