

Legionella Health and Safety Policy

Signed:

Chair: S. Gribbin

CEO: R. Swindells

Date: 5th February 2026

Review date: February 2029

This policy applies to Collective Vision Trust and all its schools. Where the name Collective Vision Trust is used this applies to all the named schools that operate as part of the Multi-Academy Trust.

Statement of intent

Collective Vision Trust understands its responsibility to assess, prevent and control any risks from harmful bacteria, like legionella, and to implement suitable precautions to ensure the health and safety of our staff, pupils and school community. To meet this duty, we have developed this policy, which outlines how the school will keep the entire school community safe from legionella.

Legionnaires' disease is a potentially fatal form of pneumonia caused by the inhalation of water droplets infected with the legionella bacteria. Legionella bacteria can occur naturally in lakes, rivers, etc. and in the water systems of buildings, such as schools. The bacteria thrive between temperatures of 20°C and 45°C; however, it can be killed by elevated temperatures or chemical treatment methods. This policy outlines how we aim to mitigate any risks involving legionella bacteria.

Note: The policy uses the term 'headteacher' that refers to the person legally named as the headteacher. In some schools this person may be referred to as the 'Executive Headteacher'. For these schools, if the action may be delegated to the Head of School, this policy will make that clear.

Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- 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
- Safety Representatives and Safety Committees Regulations 1977
- Health and Safety (Consultation with Employees) Regulations 1996
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Notification of Cooling Towers and Evaporative Condensers Regulations 1992
- HSE 'Legionnaires' disease'

This policy operates in conjunction with all other Trust and school policies.

Roles and responsibilities

The Trust Board will:

- Ensure that risks pertaining to legionella are managed so far as is reasonably practicable.
- Be legally responsible for all employees regarding health and safety.
- Put sensible and robust procedures in place to manage legionella risks that do not encourage unnecessary paperwork.
- Implement procedures that manage legionella risks to staff, pupils and visitors.
- Inform all employees about legionella risks and the precautions they need to take to manage them.
- Ensure all employees have the relevant information and training necessary to manage legionella risks.
- Ensure that legionella control measures have been implemented and are still appropriate and effective.
- Ensure that the overall health and safety provision in the school is effective and sufficient, by following the employer's policies and procedures.
- Work closely with the headteacher and SLT to ensure health and safety provision in the school is effective.

The headteacher will:

- Ensure the school is following the employer's health and safety policy and procedures.
- Identify and assess sources of risks relating to legionella, e.g. checking the water systems.
- Prevent and control any risks that arise following a legionella risk assessment.
- Keep and maintain up-to-date records of any legionella risks and the control measures implemented.
- Ensure the day-to-day development and implementation of safe working practices and conditions for all staff, pupils and visitors.
- Make sure that staff have the appropriate training in order for them to deal with risks in their areas of responsibility.
- Introduce management systems and practices that ensure risks are dealt with sensibly, responsibly and proportionately.
- Maintain effective communication with the Trust, trade union safety representatives and school staff, and give pupils and visitors clear information about on-site risks.
- Designate a competent person who will be responsible for ensuring the school meets its health and safety duties, including in relation to legionella – the competent person will be the health and safety officer.

The competent person (the health and safety officer) will:

- Assist with the creation and implementation of this policy.
- Investigate accidents and incidents, understanding the causes and amending risk assessments as required.

- Be the designated contact with the LA and the HSE where necessary.
- Support staff with any queries or concerns regarding health and safety.
- Identify hazards by conducting risk assessments.
- Implement the specific measures needed to comply with the law.
- Liaise with competent help when applying the provisions of health and safety law, e.g. external health and safety organisations.
- Report cases of legionnaires' disease to HSE, if necessary.
- Consult with trade union representatives, other employee representatives, or employees where there are no representatives, regarding health and safety matters.
- Check water temperatures during climatic changes.
- Monitor the general bacterial numbers within water systems to ensure safe levels.
- Arrange expert microbiological sampling of water systems when elevated bacteria levels have been identified.
- Prepare a written scheme for preventing and controlling the risk of legionnaire's disease.
- Check risks of contaminated water supplies.
- Check systems for deposits of rust, sludge, scale or biofilms.

All staff will:

- Act in accordance with this policy at all times.
- Report any concerns regarding legionella to the health and safety officer as soon as possible.
- Cooperate with their employers on health and safety matters.
- Carry out their work in accordance with training and instructions.
- Familiarise themselves with the Health and Safety Policy and aspects of their work related to health and safety.
- Follow the instructions of the health and safety officer.
- Ensure the health and safety of pupils.

Identifying and assessing risks

The health and safety officer will conduct a risk assessment to identify and assess any risks regarding legionella. Risk assessments must be up-to-date and reflect any changes to the water system. Where necessary, experts can be consulted for assistance with risk assessments, control measures and compliance.

Where required, the health and safety officer will seek advice when conducting the risk assessment, e.g. from external consultancies.

The health and safety officer and site manager will understand, and ensure any other relevant staff understand, how to use the water systems and equipment associated with the systems, e.g. pumps.

By understanding the systems and related equipment, the health and safety officer and site manager will ensure that any associated risks from exposure to legionella are identified. The school will establish whether:

- The water temperature in all or some parts of the system is between 20°C and 45°C.
- Water is stored or re-circulated as part of the system.
- There are sources of rust, sludge, scale, organic matter and biofilms.
- The conditions are likely to encourage bacteria to multiply.
- It is possible for water droplets to be produced and, if so, whether they can be dispersed over a wide area, e.g. showers and aerosols from cooling towers.
- It is likely that any of the school's community are more susceptible to infection due to age, illness or a weakened immune system, and whether they could be exposed to any contaminated water droplets.

The risk assessment will include the following:

- Management responsibilities, including the name of the competent person and a description of the water system installed
- Details of the competence and training of all key personnel
- Any identified potential risk sources
- Any controls in place to mitigate these risks
- Details of monitoring, inspection and maintenance procedures
- Records of the monitoring results, inspections and checks carried out
- Arrangements to review the risk assessment annually, particularly when there is reason to suspect it is no longer valid

When undertaking the risk assessment, if the health and safety officer deems that the risks are low and are being properly managed in accordance with the law, the assessment will be considered complete.

Where the assessment is considered complete, the health and safety officer may deem that no further action is required; however, any existing control will be maintained and the assessment will be regularly reviewed in case anything in the system changes.

The risk assessment will be reviewed annually, following any known changes to the system or when a concern over the system has been raised.

If the risk assessment raises any concerns, the health and safety officer will inform the appropriate members of staff, e.g. the SBM, and control measures will be implemented.

The school will follow the HSE's latest guidance on Legionnaires' disease when inspecting cooling systems, including the recommendations with regard to inspection frequency and photographic records of cleaning.

The school will put measures in place to recognise and assess the risk for people involved in sampling, monitoring and inspecting, such as staff training, respiratory protective equipment (RPE), and precautionary measures.

Where there is need for rapid sampling, the school may use quantitative polymerase chain reaction (qPCR) testing for legionella in the following circumstances:

- To carry out rapid detection for screening, e.g. if there has been an outbreak of Legionnaires' disease
- To indicate the effectiveness of cleaning and disinfection, e.g. following on from remediation
- As a complementary tool for monitoring the effectiveness of Legionella control measures

Managing risks

The health and safety officer must have the authority, competence, understanding and skills to fulfil this role.

If several people are responsible for managing risks, the school will ensure that all competent persons understand their role in the management of the system. It is a recommendation that people who are more susceptible to infection will not be involved in sampling or investigations. It is important to establish a robust procedure for water treatment including monitoring and maintenance.

Where contractors are used to undertake water treatments, the competent person will ensure that the treatment meets all legal obligations.

Preventing risks

Following a risk assessment, the health and safety officer will consider whether the risk of legionella can be prevented by reviewing the type of water system that is installed and assessing whether it is fit for purpose.

The school will ensure that the design, maintenance and operation of water services are in a condition that prevents or controls the growth and multiplication of legionella.

If risks that cannot be prevented are identified, the health and safety officer will develop a written control scheme, which will help the school to manage the risk of legionella.

The control scheme will implement effective control measures by outlining the following:

- The water system, e.g. develop a schematic diagram
- Who is responsible for carrying out the assessment and managing its implementation
- The safe and correct operation of the system
- What control methods and other precautions will be used
- What checks will be carried out, and how often they will be carried out, to ensure the controls remain effective

To ensure the health and safety of the school community regarding preventing legionella, the school will:

- Ensure that the release of water spray is sufficiently controlled.
- Avoid water temperatures and conditions that favour the growth of legionella and other microorganisms.
- Ensure water cannot stagnate anywhere in the system by keeping pipe lengths as short as possible or removing redundant pipework.
- Avoid materials that encourage the growth of legionella.
- Keep the system and the water in it clean.
- Treat water to either control the growth of legionella (and other microorganisms) or limit their ability to grow.
- Monitor any control measures applied.
- Keep records of control measures and other actions taken, such as maintenance or repair work.

The school will consult with employees or their representatives, as necessary, on the identified risks and the measures and actions that will be taken to prevent and control the risks.

Record keeping

The health and safety officer will maintain an up-to-date record of any significant legionella findings, including any individuals who are identified as being particularly at risk and the steps taken to prevent or control risks.

The school is required to keep records of the following:

- The person(s) responsible for conducting the risk assessment
- Any significant findings that were identified from the risk assessment
- Any written control scheme and details of its implementation
- Details of the state of operation of the system, i.e. in use or not
- Any results following monitoring inspections, including the dates of these

Records will be retained while they are in date, and for at least two years afterwards. Additionally, any records of monitoring inspections will be kept for at least five years.

In addition to the previous list, the school should keep records of the following items:

- Names and positions of people, and their deputies, responsible for carrying out the various tasks under the written control scheme
- Names and positions of people responsible for implementing the written control scheme, their respective responsibilities and their lines of communication
- A risk assessment and a written scheme of actions and control measures
- Schematic diagrams of the water systems

- Details of precautionary measures that have been implemented including with enough detail to show that they were implemented correctly, and the dates on which they were carried out
- Remedial work required and carried out, and the date of completion
- A signature of the person who carried out the work
- A log detailing visits by contractors, consultants and other personnel
- Cleaning and disinfecting procedures and associated reports and certificates
- Results of any chemical analysis of the water
- Results of any biological monitoring
- Information on other hazards, e.g. treatment chemicals
- Cooling tower and evaporative condenser notifications
- Training records of personnel

Records will be retained in line with the school's Records Management Policy and Data Protection Policy.

Incident reporting

It is important to ensure that employees are aware of Legionella risks and understand the control measures in place. All incidents of legionella must be reported as soon as possible to the health and safety officer.

The health and safety officer will be responsible for informing the headteacher – the notification will cover:

- Details of the sample.
- The organism present in the sample.
- The location.
- Advice on appropriate remedial measures.

If a member of the school community is taken ill following exposure to legionella, the CEO will be notified immediately.

Reporting procedure

Should an incident require [reporting](#), the health and safety officer, or a person appointed on their behalf, will file a report as soon as is reasonably possible.

The designated person will complete the [relevant online form](#).

Alternatively, the designated person can report fatal, specified and major incidents via telephone on 0345 300 9923 (Monday to Friday 8:30am to 5:00pm).

The school will notify the LA, in writing, if a cooling tower or evaporative condenser is present on site, and include details about where they are located. The school will also inform the LA if and when such devices are no longer in use.

Accident investigation

All occurrences of legionella, however small, will be investigated by an appointed party and the outcomes recorded.

The length of time dedicated to each investigation will vary on the seriousness of the occurrence.

After an investigation takes place, a risk assessment will be carried out, or the existing risk assessment will be amended, to avoid reoccurrence.

Where appropriate, the health and safety officer will complete the relevant form as outlined above.

Implementing a control scheme

The school will avoid using water systems, parts of water systems or systems of work that lead to exposure of legionella as far as reasonably practicable. The health and safety officer will establish a written control scheme in instances where it is not reasonably practicable to avoid these.

The implementation of any written control scheme will be monitored by the health and safety officer.

The health and safety officer will supervise anyone involved in any related procedure of the written control scheme.

The health and safety officer will ensure all responsibilities are defined in the written control scheme and all staff understand these responsibilities.

Staff with any responsibilities within the written control scheme will have the necessary skills and experience needed to carry out their roles.

The health and safety officer will ensure that there is an appropriate number of staff available during all hours that the water system is operating – this will be established depending on the risks the water system poses.

The health and safety officer, or their deputies, will be contactable during all hours that the water system is in operation.

There will be established methods for communication and management when there are several people who are responsible for the control scheme.

The school will be responsible for the health and safety of the school's community, regardless of if contractors are employed for any reason.

The written control scheme will include details of the following:

- An up-to-date plan showing the layout of the plant or water system, including parts temporarily out of use (a schematic diagram is sufficient)
- A description of the correct and safe operation of the system
- The precautions that have been implemented
- Checks to carry out to ensure the written control scheme is effective and the frequency of such checks
- The remedial action to take if the written scheme is shown not to be effective

The written control scheme will give details on how to use and carry out the various control measures and water treatment regimes, e.g. health and safety information regarding storage.

The written control scheme will also provide details on the correct operation of the water system, including:

- Commissioning and recommissioning procedures.
- Shutdown procedures.
- Checks of warning systems and diagnostic systems in case of system malfunctions.
- Maintenance requirements and frequencies.
- Operating cycles – including when the system plant is in use or not.

Monitoring and review

It is vital that the effectiveness of control measures is monitored and that decisions are made about when and how monitoring should take place. As such, to ensure the policy and control measures remain up-to-date, this policy will be reviewed when:

- There have been changes to the water system or its use.
- There have been changes to the use of the building in which the water system is installed.

- There is new information about risks or control measures available.
- The results of checks indicate that control measures are no longer effective.
- There are changes to key personnel.
- There is a case of legionnaires' disease or legionellosis associated with the system.

Any changes to this policy will be communicated to all members of staff, and parents, where necessary.

Appendix one

Flushing, Temperature Testing and Disinfection Procedure

Flushing

1. All water outlets are flushed through once weekly and a written record is kept in writing on a water outlet flushing checklist.
2. Flushing will last a minimum of two minutes and be conducted at a reasonable flow rate.
3. Routinely used water outlets do not require additional flushing as the use acts as a flushing measure.
4. Flushing will always be required for all water outlets following periods of non-use of four days or longer, except where disinfection procedures apply.

Temperature testing

1. A single cold and hot tap on the main water system, not connected to a thermostatic mixing valve, are each to run for at least two minutes every month so an accurate temperature can be taken using a thermometer.
2. The temperature will be recorded on the **Water Temperature Checklist**.
3. A cold water tap should be below 20°C after two minutes running.
4. A hot water tap should be above 50°C after two minutes running.
5. If the temperature does not meet these requirements, the **headteacher** will be informed immediately.
6. Further scientific tests may be required when there appears to be a problem with the water supply.
7. If a positive legionella test is reported, there will be a re-test every three or six months until two consecutive clear readings are established.

Disinfection

1. Following a sufficiently high result after testing, the water supply will be disinfected by an approved contractor.
2. The **Site Manager** will arrange the time and date of disinfection with the selected contractor.
3. Affected areas will be withdrawn from use until disinfection has been completed.
4. Flushing of affected outlets will cease until the disinfection is complete.
5. Clean water for the kitchen area will be sourced from an uncontaminated supply on the morning of disinfection.
6. Drinking water must only be drawn from the alternative supply.
7. Alternative hand cleaning methods will be instigated such as antiseptic wipes.
8. Staff and pupils will be protected from accidental use or contact with disinfected water by the use of security measures.

Once disinfection commences, the water system will not be usable until it is declared safe by contractors. Disinfected areas will be immediately re-instated following the completion of the disinfection process and a declaration of safety issued.