

St. Theresa's Catholic Primary School

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Catholic Primary School



LEGIONELLA MANAGEMENT PLAN

"We learn together, we play together, we pray together, we grow together in the love of God"

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Catholic Primary School



Validation Grid

Title	Legionella Management Plan
Author	Barbara Costa
Committee	Wellbeing
Target Audience	School Community
Stakeholders Consulted	Governors
Curriculum / Non Curricular	Non Curricular
Associated Policies / Documents	Health & Safety Policy, Critical Incident Policy, Data Protection Policy
New Policy or Review of Existing Policy	Review
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Headteacher

Barbara Costa

Barbara Costa

Chair of Governors

Fiona Kerin

Fiona Kerin

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Statement of Intent

The school recognises its legal responsibilities, to assess, prevent and control any risks from harmful bacteria, like legionella, and to implement suitable precautions to ensure the health and safety of the staff, pupils and school community.

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.

1. 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'

2. Roles and Responsibilities

Governors:

The Governors are responsible for:

- The health and safety of all their employees and pupils and ensuring this provision is effective and sufficient
- Appointing suitably qualified Water Treatment Services Providers to manage the necessary procedures for the prevention and control of Legionella

- Ensuring that risks pertaining to legionella are managed so far as is reasonably practicable
- Putting sensible and robust procedures in place to manage legionella risks
- Ensuring that legionella control measures have been implemented and are still appropriate and effective

Headteacher:

The Headteacher is the appointed Responsible Person.

The Headteacher is responsible for:

- Implementing and maintaining the school's planned preventative maintenance system for the control of Legionella bacteria within the school's water distribution systems
- Ensuring that persons carrying out Legionella risk assessments, monitoring and remedial works to operational systems are suitably qualified and competent to do so
- Ensuring that records of risk assessments and precautions are maintained
- Putting in place arrangements for reporting an outbreak or suspected outbreak of Legionnaires' disease
- Reporting to the Governors' Wellbeing Committee on issues regarding managing Legionella
- Ensuring that the requirements of this Policy are implemented
- Ensuring Legionella risk assessments are reviewed regularly, for example when there is any significant change to the installation, a change to the use of the building, or the results of checks indicating that control measures are no longer effective
- Ensuring procedures to manage risk are in place and that actions identified from minimising the risk listed in the risk assessment are reviewed, and actions undertaken accordingly
- Communicating with employees with regard to relevant information on the risks and control measures being undertaken to control Legionella bacteria
- Ensuring immediate action in response to notification of positive samples (out of specification results) and for the implementation of remedial actions
- Monitoring the performance of the preferred contractor and discuss deficiencies with the Wellbeing Committee
- Ensuring that Legionella-related incidents are appropriately investigated and, where necessary, reported under RIDDOR
- Ensuring appropriate training is provided to staff
- 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.
- Consult with trade union representatives, other employee representatives, or employees where there are no representatives, regarding health and safety matters.

External Heating Service:

SJP Contracts Ltd. is responsible for maintaining the school's boilers and hot water system.

External Water Treatment Service:

Integrated Water Services (IWS) is responsible for:

- Delivering a comprehensive water hygiene and control of Legionella bacteria service to ensure the school complies with the Legionella Approved Code of Practice (ACOP L8)
- Carrying out routine testing, monitoring, flushing and cleaning of all systems on a regular basis as agreed in the contract specification
- Examining the test results from the Legionella monitoring programme
- Identifying all recorded defects (including temperatures out-with the required parameters) and ensuring these are communicated to the school
- Keeping records of all such defects and actions taken to rectify them
- Providing a water hygiene and control of Legionella bacteria records management system which complies with the regulations and Legionella Approved Code of Practice (ACOP L8)
- Updating all existing risk assessments every two years as requested by the school
- Agreeing and implementing prioritised corrective actions

School Site Manager is responsible for:

- liaising with SJP and IWS
- flushing infrequently used outlets every week and maintaining a log

School Cleaners:

The cleaners are responsible for ensuring the cleanliness of water outlets.

External Property Consultants:

Barkers Associates are responsible for ensuring all school related building projects comply with legal requirements related to Legionella control.

This includes:

- Checking that designers and installers comply with 'The Water Supply (Water Fittings) Regulations 1999' and with BS EN 806 (Parts 1-5) 'Specifications for installations inside buildings conveying water for human consumption'
- Obtaining a completed Legionella Commissioning Checklist from the installer, reviewed and signed off in conjunction with the designer
- Obtaining from the designer completed drawings, Legionella risk assessment and testing schedules for all new water systems
- Ensuring that when conducting any modification or changes to existing installations all associated drawings, risk assessments and testing schedules

are updated and forwarded to the Responsible Person

To comply with its legal duties the school will:

- i. Adopt the guiding principles set out in relevant Approved Codes of Practice
- ii. Identify and assess sources of risk
- iii. Appoint a 'Responsible Person' to ensure the school meets its health and safety duties and takes responsibility for controlling any identified risk
- iv. Clearly define the organisational arrangements for achieving compliance (see Roles and Responsibilities)
- v. First consider whether the risk of Legionella can be prevented
- vi. Where an identified risk cannot be prevented, prepare, implement and manage a course of action for controlling the risk
- vii. Keep records and check that what has been done is effective
- viii. Ensure resources are made available to achieve compliance
- ix. Ensure all those personnel involved in the management of legionella risks are appropriately informed, instructed, and where necessary, trained and supervised

Infrequently Used Outlet is a term used to describe a domestic water outlet that is not used at least once a week for a minimum period of two minutes e.g. emergency showers, toilets or sinks in redundant or little used parts of buildings

3. Identification and Assessment of the Risk

A risk assessment will be conducted by an external 3rd party water specialist company to identify and assess any risks regarding legionella. Risk assessments will be up-to-date and reflect any changes to the water system.

The 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 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 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, no further action may be required; however, any existing control will be maintained and the assessment will be regularly reviewed in case anything in the system changes.

If the risk assessment raises any concerns, the appropriate members of staff (e.g. the Headteacher, Site Manager) will be informed, 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

4. Preventing Risks

The school will employ suitably qualified and competent persons to implement a control and monitoring scheme for all potential sources of risk.

The company employed will carry out assessment; monitoring and control as a member of an accredited body i.e. The Legionella Control Association.

This school currently employs Integrated Water Services (IWS).

IWS will complete the following checks:

- Monthly water temperature monitoring of sentinel and representative hot and cold outlets
- Annual TMV (thermostatic mixing valve) servicing to 9 TMVs
- Annual Legionella sampling – 3 samples to be taken from hot water outlets
- Annual TVC (thermal circulation valves) testing – 3 samples to be taken from cold water outlets

IWS provide copies of worksheets to the school, which contain records of all monitoring checks and the control measures to be adopted. The water file is held in the Site Manager's office.

The Headteacher will report a review of the legionella management work undertaken, put forward recommendations to consider (or approve) to the Wellbeing committee at least annually.

The management and execution of the following situations, is the responsibility of the Headteacher:

- an outbreak of Legionellosis, suspected or confirmed as being centred at the site
- an outbreak of Legionellosis the exact source of which has yet to be confirmed, but which is believed to be centred in an area which includes the site

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.

The school's most recent Water Hygiene Risk Assessment was completed in March 2026.

A copy of the survey is kept in the Health and Safety file in the Headteacher's office.

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 on the identified risks and the measures and actions that will be taken to prevent and control the risks.

5. Record Keeping

The school 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
- Training records of personnel

6. Incident Reporting

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.

For fatal and major incidents, the designated person will complete the relevant online form: [HSE Forms - Incident Reporting](#)

All occurrences of legionella, however small, will be investigated.

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.

7. 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.