



Legionella Safety Management Procedure

September 2026

History of Changes

Version	Description of Change	Authored by	Date
1.1	Procedure Created	K Fitzgerald	01/09/26

1. Introduction and Purpose

Borders College is committed to protecting the health, safety and wellbeing of staff, students, visitors, contractors and others who may be affected by its activities and premises.

The purpose of this procedure is to ensure that the risks associated with **Legionella bacteria and Legionnaires' Disease** are identified, assessed and effectively controlled across all College premises.

The procedure establishes a consistent approach to the management, monitoring, maintenance and review of water systems and provides clear responsibilities for college employees and competent contractors.

It also provides a clear emergency response where monitoring identifies a potential loss of control, elevated Legionella results or a suspected case of Legionnaires' disease.

The procedure is based on the principles contained within:
HSE ACoP L8 – Legionnaires' disease: The control of legionella bacteria in water systems.

2. Scope

This procedure applies to:

- All Borders College campuses and buildings.
- Staff, students, visitors and contractors.
- College-owned and managed hot and cold-water systems.
- Stored hot and cold-water systems.
- Showers and other aerosol-generating outlets.
- Areas that may be temporarily vacant or unused.
- Water systems within leased or occupied areas where the College has management or contractual responsibilities.
- Contractors undertaking work on college water systems.
- New installations, alterations, refurbishment and decommissioning of water systems.

The level of control will be proportionate to the level of risk identified through the College's Legionella risk assessment.

3. Key Legislation and Guidance

The College's Legionella arrangements will take account of relevant legislation and guidance, including:

Health and Safety at Work etc. Act 1974

Places duties on employers to protect employees and others who may be affected by their activities.

Control of Substances Hazardous to Health Regulations 2002 (COSHH)

Legionella bacteria are biological agents and COSHH requirements may apply where there is a risk of exposure. HSG274 identifies COSHH as one of the key legal frameworks relevant to Legionella control.

Management of Health and Safety at Work Regulations 1999

Requires suitable and sufficient assessment of risks and appropriate arrangements for managing health and safety.

HSE ACoP L8

Provides the principal Approved Code of Practice for controlling the risks from Legionella in water systems. It covers risk assessment, the role of the responsible person, control schemes, monitoring and review.

HSE HSG274

Provides technical guidance covering:

- Evaporative cooling systems.
- Hot and cold-water systems.
- Other risk systems.

The College will ensure that its arrangements are reviewed against current legislation and guidance whenever significant changes are made.

4. Definitions

Legionella

A group of bacteria that can occur naturally in water environments and can multiply in purpose-built water systems where conditions are favourable.

Legionnaires' Disease

A potentially serious form of pneumonia caused by inhaling small droplets of water contaminated with Legionella bacteria.

Legionellosis

The collective term for illnesses caused by Legionella bacteria, including Legionnaires' disease and Pontiac fever.

Aerosol

A fine mist or spray of water droplets that can become airborne and potentially be inhaled.

Responsible Person

The Estate Manager appointed by the college to take responsibility for managing and controlling the risks associated with Legionella.

Competent Person

Facilities Team members(s) with sufficient training, knowledge, experience and ability to undertake the relevant Legionella duties.

Risk Assessment

A systematic assessment of the water systems to identify Legionella hazards, people who may be exposed and the controls required.

Written Control Scheme

The documented arrangements describing how Legionella risks will be controlled, including responsibilities, monitoring, maintenance and remedial actions. HSE guidance identifies the written control scheme as a key component where a risk requiring control has been identified.

TMV

A thermostatic mixing valve used to control the temperature of water at an outlet, reducing scalding risk.

5. Legionella and Legionnaires' Disease

Legionella bacteria are commonly found at low levels in natural water sources. Problems can arise when bacteria enter building water systems and conditions allow them to multiply.

Risk increases where systems contain:

- Water stored or recirculated for periods of time.
- Temperatures favourable to bacterial growth.
- Areas of low or no water flow.
- Scale, sludge, rust or biofilm.
- Dead legs or redundant pipework.
- Poorly maintained water systems.
- Outlets capable of producing aerosols.

HSE identifies water temperatures around **20°C–45°C** as conditions that can favour Legionella growth.

Particular attention should be given to showers and other outlets that can generate aerosols.

6. Legionella Risk Register

The College will maintain a suitable and sufficient Legionella risk assessment for relevant water systems.

The assessment will identify:

1. The water systems present.
2. How the systems operate.
3. Potential sources of Legionella.
4. Conditions that could encourage bacterial growth.
5. Aerosol-generating outlets.
6. People who may be exposed.
7. Individuals who may be particularly susceptible.
8. Existing control measures.
9. Monitoring requirements.
10. Remedial actions required.

The assessment will be reviewed:

- Following significant changes to a water system.
- Following refurbishment or construction.
- Following changes in building use.
- Following significant changes in occupancy.
- Following prolonged periods of closure.
- Following an incident or suspected contamination.
- Where monitoring indicates that existing controls may no longer be effective.
- At the frequency specified within the risk assessment.

HSE states that all relevant systems require risk assessment, although the complexity of control measures should reflect the level of risk.

7. Water System Risk Management

The College will maintain accurate information about its water systems, including where reasonably practicable:

- Schematic drawings.
- Storage tanks.
- Hot water systems.
- Cold water systems.
- Distribution pipework.
- Showers.
- TMVs.
- Calorifiers.
- Thermostats.
- Expansion vessels.
- Dead legs.
- Redundant outlets.
- Other relevant equipment.

The water system information will be kept available to the Responsible Person and competent contractors.

8. Control Measures

Control measures will be determined by the risk assessment and may include:

- Maintaining appropriate water temperatures.
- Preventing stagnation.
- Removing redundant pipework.
- Regular flushing of infrequently used outlets.
- Cleaning and maintaining tanks.
- Maintaining calorifiers and associated equipment.
- Controlling scale and corrosion.
- Maintaining TMVs.
- Appropriate water treatment.
- Cleaning and disinfection where required.
- Regular inspection and maintenance.
- Preventing unauthorised alterations to water systems.

HSE recommends designing, maintaining and operating water services to prevent or adequately control Legionella growth and avoiding stagnation wherever reasonably practicable.

9. Monitoring and Testing

The College will maintain a planned monitoring programme. Legionella Testing and Routine Checks process to be followed – Appendix A.

Monitoring should include:

- Hot water temperatures.
- Cold water temperatures.
- Sentinel outlet temperatures.
- Storage temperatures.
- Visual inspections.
- Condition of tanks.
- Flushing records.
- TMV checks.
- Water quality monitoring.
- Legionella sampling where required.

Important: routine Legionella sampling should not be treated as a substitute for effective system control. HSE guidance identifies temperature monitoring and effective system management as important controls, with sampling undertaken where appropriate based on the risk assessment and circumstances.

10. Temperature Monitoring

Temperature monitoring will be undertaken at locations identified within the College's control scheme.

Results must be:

- Recorded accurately.
- Compared against the required control parameters.
- Reviewed by the responsible person or nominated competent person.
- Investigated by the Health, Safety & Environmental Manager where results fall outside the expected range.
- Followed by corrective action where necessary.

Any repeated failure to achieve the required control parameters must be escalated.

11. Flushing of Infrequently Used Outlets

Infrequently used outlets can create conditions where water stagnates.

The College will maintain a register of relevant outlets and implement a flushing regime proportionate to the risk.

This may include:

- Unused classrooms.
- Offices.
- Stores.
- Changing areas.
- Showers.
- Buildings or rooms temporarily out of use.
- Areas closed during holidays.
- Newly refurbished or recommissioned areas.

Flushing records should identify the date, location, person undertaking the activity and any issues identified.

12. Cleaning, Disinfection and Maintenance

Water systems will be maintained in accordance with the risk assessment, manufacturer's instructions and relevant HSE guidance.

Cleaning and disinfection may be required:

- Following installation.
- Following significant alterations.
- Following prolonged shutdown.
- Following contamination.
- Following unsatisfactory monitoring results.
- Where identified by the risk assessment.
- Following specific maintenance activities.

HSE states that the frequency and method of cleaning and disinfection should be determined by the risk assessment and characteristics of the system.

13. Water System Alterations and Refurbishment

No significant alteration to a college water system should be undertaken without appropriate consideration of Legionella risk.

Before work begins, consideration should be given to:

- Changes to water temperatures.
- New pipework.
- New outlets.
- Potential dead legs.
- Changes to water storage.
- Changes to building occupancy.
- Access for future maintenance.
- Commissioning and disinfection.
- Updating system schematics.
- Updating the Legionella risk assessment.

14. Out-of-Service and Vacant Areas

Where buildings or areas are closed for extended periods, the Responsible Person will ensure that the water system is appropriately managed.

This may include:

- Isolating sections of the system where appropriate.
- Maintaining suitable temperatures where required.
- Flushing systems.
- Maintaining monitoring arrangements.
- Carrying out appropriate cleaning/disinfection before recommissioning.
- Updating the risk assessment.

Water systems must not simply be brought back into normal use following prolonged closure without consideration of the Legionella risk.

15. Contractor Management

All contractors undertaking Legionella-related work must be suitably competent for the activities they undertake.

Contractors may be required to provide:

- Relevant qualifications and competency evidence.
- Insurance documentation.
- Method statements.
- Risk assessments.
- Sampling methodology.
- Test results.
- Calibration certificates.
- Disinfection certificates.
- Service records.
- Remedial action reports.

Contractors must report any significant defect or loss of control immediately to the Estate Manager and Health, safety and Environmental Manager.

Contractors must not alter College water systems without appropriate authorisation.

16. Roles and Responsibilities

The Health, Safety and Environmental Manager will:

- Provide adequate resources.
- Ensure suitable systems are in place.
- Support the Responsible Person.
- Ensure significant risks are addressed.
- Review Legionella performance.

The Estate Manager will:

- Coordinate Legionella management.
- Ensure the risk assessment is maintained.
- Implement the written control scheme.
- Ensure monitoring is undertaken.
- Review monitoring results.
- Arrange remedial action.
- Maintain records.
- Liaise with competent contractors.
- Escalate significant issues.
- Ensure relevant staff are competent.

Health, Safety & Environmental Manager

The Health, Safety & Environmental Manager will provide oversight and advice and monitor compliance with the College's Legionella management arrangements.

The Facilities Team

The Facilities Team will support:

- Routine monitoring.
- Flushing.
- Maintenance.
- Access for contractors.
- Defect reporting.
- Record keeping.

Employees

Employees must:

- Follow College procedures.
- Report defects or concerns.
- Report unused outlets or changes in building use.
- Not interfere with water system controls.

Contractors

Contractors must work in accordance with agreed procedures and immediately report defects, abnormal results or potential Legionella risks.

17. Training and Competence

Anyone undertaking Legionella-related duties must receive appropriate information, instruction, training and supervision.

Competence requirements should reflect the individual's role.

Training records will be maintained and reviewed.

Where specialist assessment, sampling, analysis or remedial work is required, appropriately competent external contractors will be appointed.

18. Record Keeping

The College will retain appropriate Legionella records, including:

- Current risk assessments.
- Written control schemes.
- Water system schematics.
- Temperature records.
- Flushing records.
- Sampling results.
- Cleaning and disinfection records.
- Maintenance records using The Legionella test Log (Appendix B).
- Contractor reports.
- Remedial action records.
- Training records.
- Incident and emergency records.
- Reviews and audits.

Records should be readily accessible to those responsible for managing the risk.

19. Review and Audit

The effectiveness of the Legionella management system will be periodically reviewed.

The review will consider:

- Monitoring results.
- Outstanding actions.
- Contractor performance.
- Changes to buildings.
- Changes to water systems.
- Incidents.
- Complaints.
- Training.
- Risk assessment findings.
- Changes in legislation or guidance.

The procedure will be updated where necessary.

20. Suspected Legionella Contamination – Emergency Procedure

Where there is a significant concern regarding Legionella contamination, the College will act promptly.

Examples include:

- Significant or repeated failure of temperature controls.
- Evidence of contamination.
- Positive Legionella sampling results requiring action.
- Failure of critical water treatment or control measures.
- Significant stagnation.
- Suspected contamination following maintenance.
- Discovery of significant system defects.

Immediate actions

1. **Do not ignore the result or concern.**
2. Notify the Responsible Person.
3. Assess the immediate risk.
4. Restrict access to affected outlets/areas where necessary.
5. Prevent use of potentially contaminated aerosol-generating outlets where appropriate.
6. Contact the competent Legionella contractor.
7. Obtain specialist advice.
8. Arrange investigation and remedial action.
9. Record all actions.
10. Review the risk assessment and control measures.

The exact response should be determined by the competent person and circumstances of the incident rather than applying a single response to every positive result.

21. Suspected Case of Legionnaires' Disease

Any suspected case associated with college premises must be escalated immediately to the Health, Safety and Environmental Manager.

Who must:

- Notify senior management and Health & Safety.
- Seek appropriate public health advice.
- Cooperate with NHS/public health authorities.
- Preserve relevant water system records.
- Provide access to competent specialists.
- Identify potentially affected systems.
- Implement any control measures advised by the relevant authorities.
- Maintain accurate records of actions taken.

The College should **not attempt to independently investigate or manage a suspected outbreak without appropriate specialist/public health involvement.**

22. Communication and Escalation

The following escalation structure should be used:

Issue identified → Responsible Person → Health Safety & Environmental / Estate Manager → Senior Management → Specialist Contractor / Public Health Authority where required

All significant incidents should be documented.

Staff must have a clear method of reporting concerns, including out-of-hours arrangements where relevant.

23. Contractor and Emergency Contact Information

A controlled contact list should be maintained within the procedure.

	Name/Organisation	Contact details
Responsible Person	Katrina Fitzgerald	07824 605345 – kfitzgerald@borderscollege.ac.uk
Health, Safety & Environmental Manager	Katrina Fitzgerald	07824 605345 – kfitzgerald@borderscollege.ac.uk
Estates/Facilities	Robert Speirs	01896 663839 – rseirs@borderscollege.ac.uk
Legionella Contractor	C&S Water	01613596219
Water Hygiene Specialist	C&S Water	01613596219
Public Health Regional Health Team	NHS	Daytime – 01896 825600 Out of hours – 0300 7906264

Note: Contact details should be verified and reviewed whenever the procedure is updated.

24. Emergency Legionella Flowchart

LEGIONELLA CONCERN IDENTIFIED

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Is there a potential loss of control?

Examples: abnormal temperature, stagnation, contamination, system failure or significant defect.

↓ **YES**

Immediately inform the Responsible Person

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Assess the risk

Consider:

- What system is affected?
- Which outlets are affected?
- Can aerosols be generated?
- Who could be exposed?
- Is the system currently in use?
- Is immediate restriction required?

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Restrict use where necessary

Particularly showers or other aerosol-generating outlets where there is a credible risk.

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Contact competent Legionella contractor / specialist

Arrange appropriate investigation, sampling, cleaning, disinfection or remedial work as required.

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Review results and specialist advice

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Is the system adequately controlled?*

NO → Continue restrictions and remedial action.

YES → Confirm controls are effective and safe to return to normal use.

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Record and close incident

- Record findings.
- Record remedial actions.
- Update monitoring records.
- Review risk assessment.
- Identify lessons learned.
- Escalate significant issues to management.

Suspected case of Legionnaires' disease?

YES → **IMMEDIATE ESCALATION TO APPROPRIATE PUBLIC HEALTH AUTHORITIES AND SENIOR MANAGEMENT**

The College should cooperate fully with any investigation and follow specialist/public health instructions.

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