



Legionella Management Policy

Tree of Life Educational and Therapeutic Input Ltd.
Reviewed September 2025

1. Introduction

This policy sets out Tree of Life Educational and Therapeutic Input Ltd arrangements for the prevention and control of legionella bacteria in our water systems, including the swimming pool and associated facilities. The health, safety, and wellbeing of pupils, staff, contractors, and visitors is our highest priority.

Legionella bacteria can cause Legionnaires' disease, a potentially fatal form of pneumonia, and other illnesses. We have a legal and moral duty to assess, control, and monitor this risk.

2. Aims and Objectives

- To comply with all statutory requirements for legionella control.
- To safeguard pupils, staff, and visitors from legionella-related illness.
- To implement appropriate monitoring and control measures.
- To maintain clear records of all checks, servicing, and remedial works.
- To ensure staff are trained and competent in identifying and managing risks.

3. Scope

This policy applies to:

- All water systems within the premises, including but not limited to:
 - Swimming pool water, filters, and balance tanks.
 - Poolside showers and changing room facilities.
 - Cold water storage tanks and distribution pipework.
 - Hot water cylinders and calorifiers.

- Drinking water supplies and outlets.
- All staff, pupils, contractors, and visitors using these facilities.

4. Legal and Regulatory Framework

This policy is informed by the following legislation and guidance:

- Health and Safety at Work etc. Act 1974.
- Management of Health and Safety at Work Regulations 1999.
- Control of Substances Hazardous to Health (COSHH) Regulations 2002.
- HSE Approved Code of Practice L8 (ACoP L8) and HSG274 (Parts 2 & 3).
- Department for Education: Health and safety: responsibilities and duties for schools.
- Pool Water Treatment Advisory Group (PWTAG) Code of Practice.

5. Roles and Responsibilities

Trustees / Proprietors/Castleton Swimming baths Owners

- Ensures that adequate resources are available for compliance.
- Holds senior leaders accountable for implementation.

c/o Headteachers /Site Manager/ Castleton swimming baths Owners

- Overall responsibility for ensuring compliance.
- Ensures the risk assessment and written scheme of control are in place.
- Ensures staff and contractors are competent.

Health & Safety Lead – Jo Halkyard / Site Manager – Daniel Frain

- Day-to-day responsibility for water safety.
- Implements monitoring and control measures.
- Maintains records in the Water Safety Logbook.
- Liaises with external contractors and authorities.

External Water Hygiene Contractor

- Conducts legionella risk assessments (minimum every 2 years).
- Carries out scheduled monitoring, testing, and remedial works.
- Provides expert advice and documentation.

Staff

- Report defects, leaks, or stagnant outlets immediately.
- Follow instructions when using showers, taps, and pool facilities.

6. Risk Assessment

A legionella risk assessment will be carried out by a competent person and reviewed:

- Every two years.

- After significant changes to water systems.
- Following an incident or detection of legionella.

The assessment will identify potential hazards, susceptible persons, and control measures.

7. Control Measures

General Water Systems

- Hot water: stored at $\geq 60^{\circ}\text{C}$, distributed at $\geq 50^{\circ}\text{C}$.
- Cold water: stored and distributed below 20°C .
- Flushing: little-used outlets flushed weekly for at least 2 minutes.
- Temperature checks: monthly at sentinel outlets.
- Tanks and calorifiers: inspected quarterly and cleaned annually.
- Microbiological testing: annually, or more frequently if indicated.

Swimming Pool – Pool Staff

- Pool water disinfected automatically and maintained per PWTAG guidelines.
- Chlorine and pH levels checked at least 3 times daily when in use.
- Backwashing and chemical dosing carried out per manufacturer's instructions.
- Microbiological sampling (coliforms, pseudomonas, legionella if required) carried out monthly or as per risk assessment.
- Balance tanks inspected and cleaned annually.
- Poolside showers flushed weekly, descaled and disinfected quarterly.

8. Monitoring and Record Keeping

- All checks and test results recorded in a Water Safety Logbook.
- Records retained for at least 5 years.
- Any non-compliance (e.g., temperature failures, positive legionella results) escalated immediately to the Headteacher and Governing Body.

9. Training and Awareness

- Site staff responsible for checks will receive legionella awareness training.
- Contractors must provide evidence of competence and training.
- Staff and pupils using the pool will be briefed on safe practice (e.g., showering before swimming).

10. Incident Response

In the event that legionella is detected:

1. Isolate the affected outlet, system, or pool immediately.
2. Notify the Headteacher and Governing Body.

3. Inform UK Health Security Agency (UKHSA) and follow their guidance.
4. Engage a specialist contractor for disinfection, remedial action, and re-testing.
5. Document all actions taken and review risk assessment.

11. Policy Review

This policy will be reviewed annually by the Health & Safety Lead and approved by the Governing Body.

Interim reviews will be undertaken if:

- There are changes to legislation.
- There are alterations to water systems.
- An incident occurs.

12. Appendices

Appendix A – Monitoring Schedule (example)

- Daily: Pool chlorine and pH checks (3x per day).
- Weekly: Flushing of little-used outlets; shower flushing.
- Monthly: Sentinel outlet temperature checks; log reviews.
- Quarterly: Tank and calorifier inspection; shower descaling.
- Annually: Pool balance tank clean; microbiological testing of water systems.
- Biennially: Legionella risk assessment.

Appendix B – Record Templates

- Water temperature log.
- Pool testing log.
- Outlet flushing log.
- Contractor service report log.