



MacIntyre
Providing support...your way

MacIntyre School and Children's Homes Legionella Management Policy

This MacIntyre policy is formally reviewed annually by the Policy Owner and Lead Reviewer, or sooner if there are changes to relevant legislation or the organisation.

For the date of, or evidence of, the most recent review, please see '*MacIntyre policy and associated guidance list*'.

➤ Link: [Policies and Resources | MacIntyre \(macintyrecharity.org\)](https://macintyrecharity.org/policies-and-resources)

Document Control

Title:	Legionella Management Policy
Issue number	01
Scope of document	MacIntyre School and Children's Homes
Policy Owner	Director of Children and Young People
Lead Reviewer	Commercial and Business Lead / Senior Health and Safety Advisors
Document effective date	August 2026

Contents

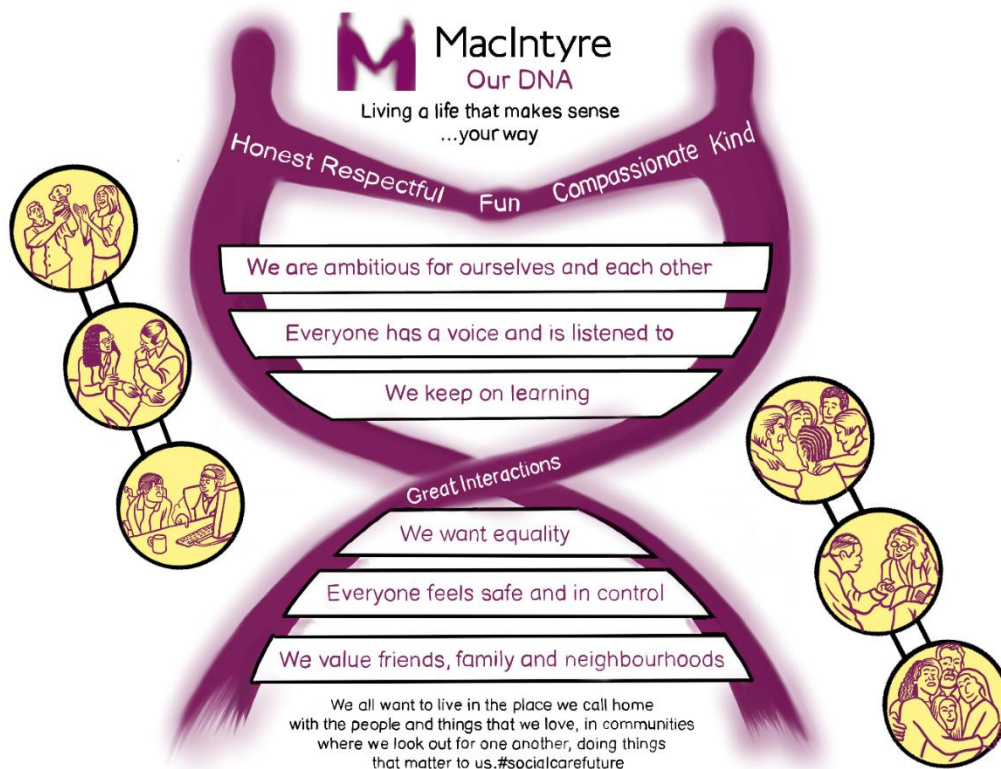
Underpinning Principles

- 1. Purpose**
- 2. Scope**
- 3. Summary**
- 4. Policy Statement**
- 5. Roles and Responsibilities**
- 6. Principles for Implementation**
- 7. Compliance and Monitoring**
- 8. Related Policies / References**
- 9. Review and Revision**

Underpinning Principles

MacIntyre's DNA shows the importance we put on ensuring each person is at the centre of their support. People who draw on MacIntyre's support have gloriously ordinary lives, living the life they choose, using their gifts, skills and passions to contribute and connect to the people in their local neighbourhood. MacIntyre invests in, and helps shape, neighbourhoods to be inclusive and welcoming spaces for everyone.

This is evident in our distinctive philosophy and way of working that underpins all our activities. It is the very essence of what we do, and that is why we refer to it as our DNA.



1. Purpose

To ensure compliance with legal requirements and the effective control of risks associated with legionella bacteria.

2. Scope

This policy applies to any use or storage of hot and/or cold water that is owned, managed, maintained or controlled, to any extent, by MacIntyre School and Children's Homes that could result in the formation and/or transmission of water droplets (aerosols) which may be inhaled by any person, thereby creating a reasonably foreseeable risk of exposure to legionella bacteria.

3. Summary

Legionella bacteria can proliferate in water systems where conditions support growth and aerosol generation. Systems that present a reasonably foreseeable risk include:

- Cooling systems (e.g., cooling towers, evaporative condensers)
- Hot and cold water systems
- Spa pools
- Other water-based systems where:
 - Water temperature is between 20–45 °C
 - Aerosols can be generated
 - Water is stored or recirculated
 - Deposits such as rust, sludge, scale, or biofilm are present

Examples include domestic hot and cold water services, wet heating systems, emergency showers, sprinkler systems, and certain specialist equipment (e.g., humidifiers, water baths, misting systems).

For detailed technical guidance on identifying and managing these risks, refer to HSG274 Parts 1–3 (Health and Safety Executive).

4. Policy Statement

MacIntyre School and Children's Homes commits to reducing, so far as is reasonably practicable, the foreseeable risks of exposure of any person to legionella bacteria. This commitment is achieved by following the principles set out in the Health and Safety Executive publication: *"Legionnaires' disease: The control of legionella bacteria in water systems. Approved Code of Practice and guidance L8 (Fourth Edition)"*.

To deliver this commitment, the organisation:

- Appoints one or more Responsible Persons (Legionella) to manage identified in-scope water use and storage systems.
- Carries out suitable and sufficient risk assessments of all work activities and in-scope water systems to identify and evaluate foreseeable risks of exposure to legionella bacteria.
- Identifies any particular "at risk" groups of children and young people or staff who may be at greater risk of harm if exposed to legionella bacteria.
- Records the significant findings of each assessment.
- Produces and implements written arrangements (Legionella Management Plan) to avoid, as far as is reasonably practicable, exposure to legionella bacteria. Where avoidance is not possible, the plan specifies measures for controlling the risk and ensuring controls remain effective.
- Keeps appropriate records of management and associated monitoring activities.
- Allocates sufficient resources to ensure that foreseeable risks of exposure to legionella bacteria are managed, including appointing competent people to advise on legionella management and assist with the development and implementation of the management plan.
- Provides suitable and sufficient information, instruction, training, and supervision to relevant employees to enable them to perform their duties under this policy and associated procedures, reducing the risk of legionella growth and transmission.
- Ensures all new water systems are designed, specified, installed, and commissioned to avoid, where reasonably practicable, foreseeable exposure to legionella bacteria or, where avoidance is not practicable, to reduce risks to a tolerable level.
- Carries out a legionella risk assessment on all new buildings following handover from the Principal Contractor, incorporating findings into the building's management plan.

- Manages all works on existing domestic hot and cold water systems to ensure foreseeable risks of legionella exposure are controlled.
- Ensures all work on domestic hot and cold water systems is carried out by suitably competent people.
- Undertakes periodic audits to confirm that all relevant duties under this policy and applicable legislation are managed effectively.

Operational controls, monitoring frequencies, and responsibilities are detailed in the Legionella Management Plan and associated records, which form the basis for day-to-day management and assurance.

5. Roles and Responsibilities

Role	Responsibility
Trustees	• Ratify this policy and receive assurance that legionella risks are effectively managed.
Chief Executive Officer	• Acts as the Duty Holder for legionella management and ensures compliance with legal requirements. • Provides strategic oversight and ensures adequate resources are available.
Director of Children and Young People	• Oversees implementation of this policy across all CYP services. • Ensures senior leaders understand and discharge their responsibilities.
Head of Education and Regional Lead for Children's Homes	• Ensure local compliance with the Legionella Management Plan. • Implement control measures and monitoring activities as directed. • Escalate any concerns or non-conformances promptly.
Commercial and Business Lead	• Acts as the Responsible Person (Legionella) for MacIntyre School and Children's Homes. • Oversees the development, implementation, and review of the Legionella Management Plan. • Ensures competent contractors are engaged and monitoring activities are completed.
Children's Homes Registered Managers and MacIntyre School Teachers	• Follow the Legionella Management Plan and any local instructions (e.g., flushing regimes). • Report issues such as redundant outlets or suspected risks to the Responsible Person.
Maintenance Staff	• Comply with instructions and training related to legionella control. • Report any concerns or changes that may affect water system safety.
Local Advisory Board	• Provide oversight of policies and procedures related to legionella management. • Receive reports on compliance and monitoring activities. • Are informed of any significant incidents or non-conformances related to legionella risk.

6. Principles for Implementation of the Plan

Detailed procedures are set out in the Legionella Management Plan. This section outlines the principles for implementation:

Management of Legionella

- The Responsible Person ensures resources are allocated for managing legionella risk.
- Suitable and sufficient risk assessments are undertaken by competent persons.
- A Legionella Management Plan is developed and implemented.

Emergency Response

MacIntyre School and Children's Homes ensure that any suspected or confirmed legionella contamination is managed promptly and effectively to prevent exposure. The Responsible Person initiates emergency procedures and engages competent specialists. Detailed steps are set out in the Legionella Management Plan.

Contractor Management

MacIntyre engages only competent contractors for legionella-related tasks. Contractors are vetted for qualifications and compliance with legal and industry standards. All work is carried out under agreed safe systems of work, as detailed in the Legionella Management Plan.

Communication

Clear and timely communication is maintained with staff, contractors, and regulators regarding legionella risk and control measures. Specific communication protocols are outlined in the Legionella Management Plan.

7. Compliance and Monitoring

Non-compliance with this policy or the Legionella Management Plan must be escalated to the Responsible Person (Legionella) immediately. The Responsible Person will investigate the matter and implement corrective actions as necessary, which may include:

- Immediate remedial works to control identified risks
- Retraining of staff
- Review and update of risk assessments and management plans
- Engagement of specialist advice or external contractors
- Reporting to senior leadership and, where required, regulatory authorities

Serious non-compliance or incidents will be reported to the Director of CYP and may be escalated to the CEO and Trustees as appropriate.

- Annual statements of reassurance will be submitted to MacIntyre's central Health and Safety Team.
- Periodic external audits will be procured by the School and Children's Home (every 3 years or more frequently if required).
- Reviews of this policy will be carried out annually.

Record Keeping

MacIntyre School and Children's Homes maintain accurate and secure records to demonstrate compliance with legionella control requirements. Records include evidence of roles and responsibilities, risk assessments, management plans, monitoring activities, and training. All records are retained in accordance with legal and industry guidance and are accessible to those with a legitimate need to review compliance.

8. Related Policies / References

This policy should be read in conjunction with MacIntyre's:

- Health and Safety Policy and Procedures

MacIntyre School's:

- Health and Safety Statement of Intent
- MacIntyre School and Children's Homes Legionella Risk Assessment

Additional Legal References:

- 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 2002
- The Construction (Design and Management) Regulations 2015
- Legionnaires' disease. The control of legionella bacteria in water systems. Approved Code of Practice and guidance L8 (Fourth Edition). Health and Safety Executive (HSE).
- Water Supply (Water Fittings) Regulations 1999
- Technical Guidance HSG274 Parts 1-3 (2024)

*** Note:** There are specific water quality and water hygiene regulations that apply to mains-fed water storage and supply systems which will also need to be considered when implementing this policy.

9. Review and Revision

- A full review will be conducted annually (or sooner if legislation changes)
- Review and revision is completed by the Lead Reviewers and approved by the Policy Owner
- Any major revisions must be approved by Directors and Trustees