

TITLE	Legionella Management and Control Policy		
Policy ref:	YH014P	Approval date	November 2025
Owner	Corporate Services Director	Planned review date	November 2028
Approved by	Executive Leadership Team		

1 Background	Legionella species is a common bacterium found in almost all natural water sources and can exist within hot and cold water systems, air conditioning units, and other systems such as cooling towers. Legionnaires' disease is a potentially fatal form of pneumonia which comes about as a result of the Legionella bacteria. Whilst everyone is susceptible to infection, our residents are at greater risk due to their age, pre-existing health conditions (such as respiratory disease, immuno-deficiency etc.) and lifestyle choices (e.g. they are a smoker). People contract Legionnaires' disease by inhaling small droplets of water (aerosols) containing the bacteria, which are suspended in the air. Certain conditions increase the risk from Legionella if: • the water temperature in all or some parts of the system are between 20-45 °C, which is optimal temperature for significant growth (proliferation) • breathable water droplets are created and dispersed e.g. aerosol created by water outlets such as showers • water is stored and/or re-circulated • there are deposits that can support bacterial growth providing a source of nutrients for the organism e.g. rust, sludge, scale, organic matter and biofilms If conditions in our water systems are favourable, the bacteria levels will increase, thus increasing the risks of contracting Legionnaires' disease. It is therefore important that Abbeyfield control the risks of Legionella proliferation by introducing appropriate control measures. This policy and its associated procedures and guidance set out how Abbeyfield control the risk of Legionella within our portfolio of properties.
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2 Objectives	The aims of this policy are: • To provide a framework for managing and controlling exposure to Legionella bacteria. • To provide a procedure and guidance detailing how Abbeyfield will comply with relevant legislative requirements and provides clearly defined roles, responsibilities, and escalation procedures in the event of a suspected or Legionella outbreak.
3 Scope	All employees, including agency workers and temporary staff, visitors, volunteers, and contractors who may be present at our Abbeyfield premises, neighbours to our sites, and other members of the public who could be affected by uncontrolled Legionella management on Abbeyfield premises.
4 Policy	4.1 Roles and Responsibilities Abbeyfield has responsibility for ensuring that, so far as is reasonably practicable, its members of staff, residents, volunteers, or members of the public will not be adversely affected by the supply within and use of water at buildings which are owned, managed, or controlled by the Abbeyfield Living Society (ALS). These duties are delegated as follows: 4.1.1 Chief Executive Officer (Duty Holder) is responsible for: • Ensuring that this policy and associated procedural documents are effectively implemented; • Ensuring there are sufficient resources available to allow Abbeyfield to comply fully with this policy and associated procedures; • Reviewing the performance of direct reports with respect to the implementation and management of this policy and associated procedures; and • Informing the Executive Leadership Team and, where necessary, the Board of Trustees of any suspected major breaches of compliance relating to the management of Abbeyfield's water systems.

4.1.2 The Customer Operations Director (Responsible Person) is responsible for:

- Ensuring that this policy, associated procedures and the Legionella Management and Control Manual are effectively implemented within their area of responsibility;
- Ensuring that there are sufficient resources available to comply fully with this policy and associated procedures; and
- Informing the Corporate Services Director and, where necessary, the Chief Executive Officer, of any suspected major breaches of compliance relating to the management of Abbeyfield's water systems.

4.1.3 The Head of Property Services (Competent Person) is responsible for:

- Regularly reviewing the performance of line management in the conduct of their duties with respect to legionella management and water safety;
- Ensuring that suitable arrangements are in place for the management of any foreseeable incidents involving the water supply within buildings managed by Abbeyfield;
- Ensuring that appropriate staff training is available within their area of responsibility;
- The selection and management of suitably competent consultants and contractors to support the implementation of this policy and associated procedures and ensure ongoing contractor management is conducted;
- Ensuring the completion of initial Water Risk Assessments (WRAs) for shared water and other identified systems, and for their review at no more than 2 yearly intervals (or sooner where there is reason to believe the WRA is no longer valid);
- Ensuring the production of a suitable "Scheme of Control" (SoC) for each building managed by Abbeyfield;
- Ensuring that appropriate action is taken and recorded with respect to all recommendations from WRAs for implementation by contractors and management by the Property Team; and
- Providing support to the operational Property Team in the application of this policy and associated procedures, as well as assisting in coordinating the response to colonisation of the system

	or (suspected/confirmed) cases of Legionnaires' disease, including arranging for the treatment of water supply systems as necessary. 4.1.4 Property Manager (Compliance) (Responsible Person) is responsible for: • Ensuring that a current WRA is in place for all sites for which they are responsible, and that these WRAs are reviewed at no more than 2 yearly intervals (or sooner where there is reason to believe the WRA is no longer valid); • Ensuring that suitable arrangements are in place for the management of any foreseeable incidents involving the water supply within buildings owned and managed by Abbeyfield; • The selection and management of suitably competent consultants and contractors to support the implementation of this policy, associated procedures and Schemes of Control (SoC); • Ensuring this policy and associated procedures are effectively implemented within their area of responsibility; • Ensuring that operational property colleagues understand and implement their responsibilities as highlighted within this policy; • Ensuring that the staff they are responsible for attend relevant training; • Informing the Head of Property Services, operational directors, and the Health and Safety Team of any failures to meet the requirements set out in this policy and associated procedures; • Ensuring that any planned works programmes include measures for identifying and programming work to reduce any built-in hazards relating to water safety; • Ensuring that appropriate specifications are utilised for installation and that all installations are compliant with relevant legislation including the Water Supply (Water Fittings) Regulations 1999; • Maintaining a "master" copy of all WRA and SoCs that are produced; • Assisting operational directors to ensure Service Managers are aware of any actions they are responsible for which have been identified in WRAs and resultant SoCs; • Ensuring that any adverse sample results are reported to relevant persons within the business (operational colleagues, Health and Safety Team, Head of Property Services);
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	• Assisting in the coordinated response to a suspected or confirmed case of Legionnaire's disease; • Producing statistical reports for inclusion in information reviewed at the quarterly Customer Committee Meeting and other relevant meetings; • Arranging for the completion of new WRAs where they are informed of significant system change; • Managing contractors' performance as per contractual agreements; and • Raising concerns to the Head of Property Services and the Procurement Team where contractor performance places Abbeyfield at risk. 4.1.5 Property Team (Authorised Persons) are responsible for: • Arranging for the completion of servicing and maintenance of water systems for which they are responsible; • Effectively communicating with operational teams regarding any WRA or SoC, including any planned or reactive works that are required to mitigate any risks; • Arranging for contractors to sample, test, maintain, and service the water systems as per the SoC; • Escalating any adverse test results to their relevant Property Manager; • Escalating any contractor concerns to their relevant Property Manager in respect of the contractual arrangements, contractor performance and/or SoC requirements; and • Supporting operational colleagues in respect of advice, guidance and repair works in the management of Legionella in order to comply with the WRA and SoC. 4.1.6 Head of Health, Safety and Environment (Competent Person) is responsible for: • Providing support to operational and property colleagues in the application of this policy and associated procedures, and to assist, or where necessary, lead in the investigation of water related incidents;
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	• Ensuring that this policy, associated procedures and the Legionella Management and Control Manual remain up to date; and • Providing operational and property colleagues with suitable and timely advice in respect of legionella management. 4.1.7 Head of Care and Housing Operations (Responsible Person) is responsible for: • Ensuring that a current WRA is in place for all relevant property for which they are responsible, working in conjunction with the relevant Property Managers; • Ensuring that this policy, associated procedures and the Legionella Management and Control Manual are effectively implemented within their area of responsibility; • Ensuring that their staff understand and implement their responsibilities highlighted in this policy; • Ensuring that the staff they are responsible for attend relevant training; and • Informing the Property Managers, Health and Safety Team and, where necessary, the Chief Executive Officer, of any failures to meet these requirements set out within this policy and associated procedures. 4.1.8 Regional Operations Managers (Responsible Persons) are responsible for: • Ensuring water management tests, checks and examinations identified in the WRA and SoC are implemented, and that necessary repairs are completed to timescales identified within their area of responsibility; • Ensuring that all repairs, maintenance, tests, check and examinations etc. are recorded locally, as identified in this policy and associated procedures; • Ensuring their staff understand and implement their responsibilities highlighted in this policy; • Ensuring that the staff they are responsible for attend relevant training;
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	• Informing the relevant Property Manager of any changes to the layout or use of a building's existing water system which may alter the status of the WRA; • Informing the Head of Care and Housing Operations and the relevant Property Manager of any failures to meet these requirements as set out within this policy and associated procedures; and • Informing the Head of Care and Housing Operations, relevant Property Manager, and Health and Safety Team of any incident relating to a water system as soon as possible, and to assist with the coordination any incident response. 4.1.9 Service Managers (including Care Home Managers, Operations Managers, and Sheltered Housing Managers) (Authorised Persons) are responsible for: • Completing checks, tests, and inspections as identified in this policy, associated procedures, the Legionella Management and Control Manual, and their property's SoC, as well as keeping suitable records to evidence these checks on the Safety Culture system; • Informing their relevant Regional Operations Manager of any adverse circumstance relating to water management; • Managing and/or conducting water safety tasks within void areas of their building; • Ensuring they comply with the requirements set out in this policy, associated procedures and the Legionella Management and Control Manual; • Ensuring that "Danger - hot water" warning notices are displayed above all hot water outlets in communal areas that are not controlled by a TMV; • Informing and reminding residents of the risks of Legionella and any action that they are encouraged to take to minimise the risk e.g. cleaning of the shower head and flushing outlets; • Highlighting to their relevant Regional Operations Manager and Property Manager any changes to the layout or use of the existing water systems within their building which may alter the status of the WRA;
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	• Attending training as instructed, and ensuring the staff they are responsible for do the same; and • Notifying their relevant Regional Operations Manager and Property Team of any concerns or incidents relating to water safety as soon as possible.
5 Finance, Value for Money & Social Value	This policy ensures Abbeyfield are complying with relevant legislative requirements regarding Legionella management. There are possible negative impacts on the organisation's finances by not following such requirements through uninsured fines, liability claims, and negative publicity.
6 Linked policies	• Health and Safety (YH009P) • Infection Prevention and Control (YH010P) • Prevention of Burns and Scalds (YH015P) • Risk Assessment (HSR001)
7 Relevant Legislation / Regulation	• Management of Health and Safety at Work Regulations (1999) • Health and Safety at Work etc. Act (1974) • The Control of Substances Hazardous to Health Regulations (2002) • The Reporting of Injuries, Diseases and Dangerous Occurrence Regulations (RIDDOR) (2013) • Health and Social Care Act (2008) • (Regulated Activities) Regulations (2014) • Water Supply (Water Fittings) Regulations (1999)
8 Guidance	• Abbeyfield Legionella Management and Control Manual • ACOP L8 (Approved code of practice) http://www.hse.gov.uk/pubns/priced/l8.pdf • HSG 274 Part 2 for Hot and Cold water systems http://www.hse.gov.uk/PuBns/priced/hsg274part2.pdf • HSG 274 Part 3 for Other Risk Systems http://www.hse.gov.uk/pUbns/priced/hsg274part3.pdf

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	The guidance in Part 2 has sections for hot and cold water systems for Landlords and additional requirements for healthcare premises and Care Homes.
9 Review	Every 3 years, subject to any regulatory or legislative updates, changes in organisational structure and/or management responsibilities, or following a serious incident (e.g. Legionella outbreak).
10 Procedure(s) 10.1 10.2	Escalation Procedure and Legionella Incident Reporting Void and Low Use Legionella Management Procedure
11 Process Map(s)	Little-Used Water Outlet Flushing Process Map

Version	Purpose/change	Resident Panel Involvement	Author	Date
1.0	New Policy	N	S. Kendall H&S Manager	January 2019
2.0	Policy, procedures and guidance updated to reflect current organisational approach to legionella management and policy/procedure/guidance layout. Name changed from Legionella Prevention and Control to Legionella Management and Control.	N	J. Vitta Head of H&S	July 2022
3.0	Changes to job titles and reflect to compliance checks on Safety Culture instead of within Grey Compliance folder.	N	J. Vitta Head of H&S	October 2025