

Water Management and Legionella Control Policy

September 2026



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Policy: Water Management and Legionella Control

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Review Date: September 2027

Date Policy Agreed: September 2026

1. Purpose & Scope

This policy outlines the commitment of **Journey Education Group** to manage its water systems effectively, ensuring safety, regulatory compliance, and the prevention of waterborne pathogens, specifically *Legionella* bacteria.

This policy applies to all premises, water systems, and equipment owned, operated, or managed by Journey Education Group. It extends to all students, staff, contractors, and visitors.

2. Policy Statement

Journey Education Group will take all reasonably practicable steps to identify, assess, and minimise the risk of Legionellosis (Legionnaires' disease) and other waterborne risks within its water systems. We are committed to maintaining safe water systems through a rigorous regime of risk assessment, regular monitoring, maintenance, and robust record-keeping.

3. Statutory Framework & Guidance

This policy is structured to comply with UK health and safety legislation and statutory guidance, including:

- The Health and Safety at Work etc. Act 1974
- The Control of Substances Hazardous to Health (COSHH) Regulations 2002
- Management of Health and Safety at Work Regulations 1999
- HSE Approved Code of Practice (ACOP) L8: *Legionnaires' disease. The control of legionella bacteria in water systems*
- HSE Technical Guidance HSG274 (Parts 1, 2, and 3)

4. Roles and Responsibilities

To ensure clear accountability, Journey operates under a defined management structure for water safety:

- **The Governing Body / Proprietor:** Holds ultimate legal responsibility for health and safety at the school, ensuring adequate resources are allocated to water management and compliance.
- **The Headteacher (Duty Holder):** Has overall operational responsibility for compliance with health and safety legislation, ensuring this policy is fully implemented.

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- **The Estates/Facilities Manager (Responsible Person):** Appointed to take day-to-day managerial responsibility for supervising the implementation of this policy, organizing risk assessments, and coordinating monitoring regimes.
- **Authorised Persons (Estates Staff / Competent Contractors):** Tasked with carrying out physical checks, maintenance, and monitoring actions as detailed in the written scheme of control.

5. The Control Scheme

Journey Education Group mitigates water management risks through a structured, proactive management sequence:

1 - Legionella Risk Assessment

Every 2 years or upon system change

A competent external specialist will carry out a comprehensive Legionella Risk Assessment for all buildings. This must be reviewed at least every two years, or sooner if there is reason to suspect it is no longer valid (e.g., structural alterations to the water system).

2 - Implementation of the Written Scheme

Ongoing

Based on the risk assessment, the Estates Manager will maintain a written control scheme. This specifies the exact plant, pipework, and allocation of responsibilities, alongside the precise schedule for monitoring and maintenance.

3 - Temperature Monitoring & Flushing

Weekly / Monthly / Annually

The primary control method used is temperature regulation (keeping hot water hot and cold water cold). Authorised staff or contractors will execute the mandatory testing schedules (detailed in Section 6).

4 - Remedial Action & Water Sampling

As required

If temperatures fall outside safe limits, or if a system is modified, water sampling for *Legionella* will be conducted by a UKAS-accredited laboratory. Disinfection and flushing will be immediately ordered if counts exceed acceptable guidelines.

6. Monitoring and Maintenance Regimes

Journey adheres to the strict technical standards outlined in HSG274. The standard maintenance benchmarks include:

Frequency	Action Required	Target / Standard
Weekly	Flush little-used outlets (e.g., showers/taps in blocks)	Prevent water stagnation.

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not regularly used, or during school holidays) for several minutes.

Monthly

Check sentinel taps (nearest and furthest from the water source) for hot and cold water temperatures.

Cold: Below 20°C within 2 minutes.

Hot: Above 50°C within 1 minute.

Quarterly

Clean, descale, and disinfect all showerheads and hoses.

Remove scale/biofilm nutrients.

Annually

Inspect cold water storage tanks for cleanliness, structural integrity, and temperature (at the ball valve). Inspect calorifiers (water heaters) for debris.

Cold tanks: Below 20°C.

Calorifier flow: Minimum 60°C.

7. School Holiday Management (Critical Risk Period)

School holiday periods present an elevated risk of water stagnation due to low occupancy.

- During short holidays (half-terms), a strict **weekly flushing regime** of all outlets will be maintained by the Estates team.
- Prior to the start of the Autumn term (following the summer break), Journey will execute a **full system flush** of all hot and cold water outlets. If recommended by the current risk assessment, a full system chemical chlorination/disinfection will be undertaken by a competent specialist contractor before staff and students return.

8. Record Keeping

All records relating to water management and Legionella control must be maintained in the **Water Safety Logbook** (physical or digital) and kept for a **minimum of 5 years**. These records must include:

- The current Legionella Risk Assessment and written scheme of control.
- Names and positions of people responsible for conducting the steps.
- All monitoring logs (temperatures, flushing logs, contractor service reports).
- Certificates of water analysis/sampling results.
- Records of any remedial or corrective actions taken.

9. Policy Review

This policy will be reviewed annually by the Estates/Facilities Manager and approved by the Headteacher and Governing Body, or sooner if triggered by legislative updates or structural changes to Journey's infrastructure