

Legionella Policy



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Reviewed by:	Dee Fullerton
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1. Introduction

At The Beckmead Trust, we are committed to the health and safety of our staff, students, and visitors. This policy ensures compliance with the **Health and Safety at Work Act 1974**, the **COSHH Regulations 2002**, and the HSE's Approved Code of Practice **L8**. Under the new Regional Hub Model, this policy aligns with our localised governance structure while maintaining rigorous central oversight.

2. Roles and Responsibilities

The Trust has transitioned to a four-level governance structure to manage health and safety

- **Level 1: Board of Trustees / CEO:** Holds ultimate legal accountability for Trust-wide compliance and ensures adequate resources are allocated for water hygiene.
- **Level 2: Central Trust Committee:** Provides strategic oversight of the four Regional Hubs and manages the contract for mandatory independent external auditing.
- **Level 3: Regional Hub Committees (London, Croydon, East Sussex, Essex):** Responsible for regional operational governance and monitoring compliance data for schools within their geographic area.
- **Level 4: Academy Principals / Headteachers (Academy Duty Holder):** Responsible for day-to-day implementation of this policy on-site, ensuring site-specific logbooks are accurate and representing school needs to the Hub Committee.
- **Compliance & Estates Directorates:** Tasked with managing "hard" compliance, including bi-annual professional Legionella risk assessments. They must ensure all evidence is uploaded to the **central compliance tracker** for Hub review.
- **All Staff:** Responsible for reporting any water system defects or concerns immediately via the **Estates helpdesk**.

3. Risk Assessment and Monitoring

- **Frequency:** Sites must undergo a professional Legionella risk assessment every **2 years**, or whenever a new water system is introduced.
- **Monitoring:** Monthly temperature checks and flushing of infrequently used outlets must be recorded in the site logbook and uploaded to the central tracker.
- **External Audits:** Each Regional Hub is subject to an **annual audit** by an independent H&S firm (RPA) to verify compliance and audit closure rates.

4. Notification and Reporting

In the event of Legionella detection or a significant system failure:

1. The **Academy Duty Holder** must immediately notify the **Director of Estates** and the **Regional Hub Committee**.
2. An action plan will be agreed upon with specialist consultants.
3. The **Regional H&S Professional** is responsible for any necessary reporting to the HSE.

5. Training and Competency

All staff involved in water hygiene must complete mandatory training via the online system, with a Trust-wide compliance target of **95%+**.

6. Contractor Management

All external contractors performing disinfection or maintenance must be vetted (RAMS), registered with the **Legionella Control Association**, and may require a formal **Permit to Work** issued by the Estates Department.

Appendix 1: Health & Safety Organisational & Reporting Chart

This chart reflects the transition to the Regional Hub Model, ensuring every school has a direct voice via their Regional Hub while the Board of Trustees maintains ultimate strategic oversight through the Central Trust Committee and independent validation.

- **Level 1: Board of Trustees / CEO**
 - **Accountability:** Ultimate legal responsibility for Trust-wide Health and Safety compliance.
 - **Function:** Reviews strategic performance and ensures adequate resource allocation.
- **Level 2: Central Trust Committee**
 - **Accountability:** Strategic management of Health and Safety across the Trust.
 - **Function:** Receives termly reports from Regional Hubs and manages the contract for mandatory independent external auditing.
- **Level 3: Regional Hubs (London, Croydon, East Sussex, Essex)**
 - **Accountability:** Regional operational governance and compliance monitoring.
 - **Function:** Primary forum for joint employer/employee safety consultation for schools within that geographic region.
- **Level 4: Hub Committee Composition (Per Hub)**
 - Composed of representatives from schools in that region, including H&S Professionals, SLT members, and Compliance/Estates representatives.
- **Independent Assurance**
 - An Independent H&S Firm (RPA) or other conducts annual external audits of each Regional Hub, reporting findings to the Central Trust Committee and the Board.

Appendix 2: Flushing, Temperature Testing, and Disinfection

Procedure 1. Flushing Procedures

- **Weekly Flushing:** All water outlets must be flushed through once weekly. A written record must be kept in the site logbook.
- **Infrequently Used Outlets:** Outlets not used for **7 days or longer** must be flushed for a minimum of two minutes at a reasonable flow rate.
- **Dead Legs:** Any identified dead-leg pipework must be cut back to the main distribution line or reinstated and heavily flushed.
- **Data Upload:** All flushing logs must be uploaded to the **central compliance tracker** for Hub review.

2. Temperature Testing (Monthly)

- **Cold Water:** Must be below **20°C** after running the tap for two minutes.
- **Hot Water:** Must be above **50°C** after running the tap for one minute.
- **Water Heaters (Calorifiers):** Flow temperatures must be maintained as close to **60°C** as practicable and return temperatures must not fall below **50°C**.
- **Recording:** Results must be recorded in the Water Temperature Checklist and uploaded to the central tracker.

3. Disinfection and Maintenance

- **Professional Risk Assessment:** Sites must undergo a professional Legionella risk assessment every **2 years**, or whenever a new water system is introduced.
- **Showers and Spray Taps:** Dismantle, clean, and descale removable parts quarterly.
- **Thermostatic Mixer Valves (TMVs):** Must be inspected, cleaned, and descaled annually by competent persons.