

Policy name:	
LEGIONELLA AND WATER SAFETY	
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1. Purpose

The purpose of this Legionella and Water Safety Policy (LWSP) is to set a framework for ensuring, so far as is reasonably practicable, that the risk of infection from water systems (especially legionella bacteria) is managed within all Cornerstone controlled buildings.

To ensure Cornerstone complies with its duties by adhering to current legislation, regulations, official guidance and good practice.

To comply with its legal duties, Cornerstone will:

- Identify buildings that present a potential risk
- Prioritise and instruct competent contractors and consultants to manage the risks
- Carry out a suitable and sufficient water risk assessment
- Prepare management programmes for the remediation, prevention and control of identified risks
- Ensure that suitable and sufficient resources are available to manage the risks
- Implement, manage and monitor identified control measures
- Keep records of risks and management actions
- Nominate employees with responsibility for implementing the policy
- Provide suitable legionella awareness training where needed

2. Policy Scope

This policy outlines Cornerstone's responsibility to protect colleagues, residents, visitors, neighbours, and the public from exposure to Legionella bacteria.

Legionella occurs naturally in water but can grow in man-made water systems such as hot and cold-water systems, cooling towers, and other water-using equipment.

To reduce risk, control measures must:

- Prevent bacterial growth in water systems.
- Minimise exposure to water droplets and aerosols.

Legionella grows best in water between 20°C and 45°C, does not multiply below 20°C, and is destroyed above 60°C. Nutrients from organisms, sediment, sludge, scale, and biofilms can support growth. Biofilms can also protect bacteria from heat and biocides.

Cornerstone recognises these risks and requires all colleagues and contractors to follow this Policy and associated procedures in line with legislation and best practice.

3. Relevant Legislation

- Health and Safety at Work etc. Act 1974
- Control of Substances Hazardous to Health Regulations 2002 (COSHH)
- L8: “Legionnaires’ disease – The control of legionella bacteria in water systems”
- HSG274 – Parts 1, 2 & 3
- BS 8580:2010 – Risk assessments for Legionella control
- BS 8558:2015 – Sampling and monitoring for Legionella bacteria
- BS EN 806 / BS 8558 – Design, installation, and maintenance of water systems
- BS EN ISO 11731 – Laboratory testing for Legionella

4. Responsibilities

Chief Executive

Will have overall and final accountability for legionella management across the organisation, specifically responsible for:

- Ensuring the implementation of this policy at all levels within the organisation and the provision of adequate resources to meet the requirements of the policy
- Ensuring that suitable levels of resources and insurance are maintained

Directors

Will ensure that:

- All Managers and Supervisors implement this policy within their services
- This policy is monitored and reviewed for its effectiveness
- Legionella management arrangements are addressed in this policy
- Legionella management processes are suitably resourced, and insurances are maintained

Compliance Manager

Will ensure that:

- In liaison with the Director of Property, a competent professional legionella risk assessor is selected and appointed
- This policy is made available to all colleagues and is maintained and updated as required in line with any relevant changes in regulations and legislation, and reviewed at least every three years, following an incident and legislative change.
- Advice, support and guidance are offered to all persons working under the requirements of this operational standard
- All legionella incidents are managed and reported to the Health and Safety Committee and Director of Property within 24 hours

- All incidents are recorded on the internal reporting system, are monitored and signed off when complete
- Legionella safety standards are monitored for compliance with this operational standard
- A single point of contact is maintained in relation to Legionella management
- Training requirements for colleagues are managed and delivered within agreed timescales
- Any changes to regulations or guidance are communicated to the Director of Property Services, the Health and Safety Committee and colleagues.

The Health & Safety Committee

Will ensure that:

- They will take an overview of Legionella safety performance.
- Staff are appointed and trained as competent for key roles relevant to Legionella testing and recording purposes

Colleagues

Will ensure that they notify their manager immediately if they notice the following:

- Loss of temperature in the hot water system
- Any loss of pressure in either the hot water or cold-water systems
- Any suspected cases of Legionnaires' disease.

5.0 Risk Assessment

A detailed assessment shall be undertaken at all sites where properties have stored water in communal use.

All risk assessments will be undertaken by persons who are competent, experienced and have been correctly trained to carry out these duties.

The risk assessment will be reviewed at regular intervals, or earlier, if significant modifications are undertaken regarding the system design or utilisation of the premises.

Records of the risk assessments undertaken, as well as information regarding the maintenance, tests and remedial works carried out, together with the results, will be held for a minimum of 5 years.

The assessments will contain direction as to how the risk is to be eliminated, or where this is not possible, how the risk will be managed.

Where the risk assessment identifies no reasonably foreseeable risk, no further measures are necessary.

6.0 Prevention and Control

Wherever practicable, Cornerstone will remove the potential source of future contamination.

On new developments, refurbishments, and when carrying out planned improvements, we will 'design out' risks where possible.

When a property is vacant for more than 7 days, a designated person will enter the property and run the water supply for at least 3 minutes, and a record will be made on the weekly health and safety check.

For any communal room (ie kitchen/shower room/bathroom/guest rooms) or bedroom space that has a water supply and is either not in regular use (less than 7 days) or is void for more than 7 days, a designated person will enter the area and run the water for at least 3 minutes and a record will be made on the weekly health and safety check.

If we are made aware a resident is away from the property for an extended period of time, we will provide information regarding how to and why to flush prior to their return.

On letting a property, we will ensure that new residents are made aware of the risk of legionella and provide them with relevant information and advise them to flush through the system and ensure shower heads are clean, as part of the handover.

Once properties have been handed back to housing management these will be flushed as part of the accompanied viewing process or before the tenant signs for the property.

When risk assessments identify required works to remove or reduce risks they will be carried out as responsive repairs or as part of a planned improvement programme with agreement from the budget holder.

Where we cannot remove the risk, we will control it as far as possible in line with the Approved Code of Practice by doing the following:

- Ensuring that the release of water spray is properly controlled
- Avoiding water temperatures and conditions that favour the growth of legionella and other micro-organisms
- Ensuring water cannot stagnate anywhere in the system by keeping pipe lengths as short as possible or by removing redundant pipe work
- Avoiding materials that will encourage the growth of legionella
- Keeping the system and water in it clean

In general needs stock it is impractical for the landlord to carry out the regular weekly and monthly checks required to ensure safety from legionellosis. We will publicise the importance of carrying out such checks via our resident communications.

7.0 Monitoring

Properties that have stored water in communal use will have a legionella risk assessment completed every two years.

We will monitor the properties with a risk assessment and ensure that regular tests and identified actions are carried out within the agreed time frame.

Regular audit reports will be made available to the H&S Committee, ET and Board as agreed.

8.0 Managing a Suspected Legionella Outbreak or Incident

If a suspected case or outbreak of Legionella is reported, the Compliance Manager will immediately notify the Director of Property and Health and Safety Committee.

A designated person will record the incident, and an investigation will be initiated without delay.

Where an outbreak is suspected, an approved specialist contractor will be instructed to attend site to carry out an investigation. This will include any necessary water sampling and the implementation of agreed control measures, such as flushing or disinfection of the water system, to prevent further risk of infection.

The individual suspected of infection will be advised to seek medical confirmation from their GP or hospital.

If a Legionella infection is confirmed, the Director of Property in liaison with the Health and Safety Committee will complete and submit a RIDDOR notification to the Health and Safety Executive in accordance with statutory requirements.

A formal investigation report will be completed by the nominated person, detailing findings and actions taken. This report will be submitted to the Health & Safety Committee and shared with the Executive Team.

9.0 Remedial Works

All remedial works shall be carried out by competent persons with appropriate knowledge and experience of legionella control measures and an understanding of the risks associated with undertaking such works.

Contractors must be fully conversant with the Water Supply (Water Fittings) Regulations 1999 (as amended) and the relevant British Standards, including BS 6700. Failure to implement recommended remedial actions may compromise the effectiveness of the control measures in place and increase the risk of Legionella infection.

When increasing temperatures at hot water outlets is necessary, a scalding risk assessment must be completed. Consideration must also be given to the installation of thermostatic mixing valves (TMVs) at points of use to reduce the risk of scalding.

Guidance for Priorities:

The priorities shown for each of the recommendations are guidance only and are intended to permit sound judgment by the Responsible Person in line with other safety priorities. The following should help with decision making:

	Timescale	Description
Immediate	0-3 days	Items will have been raised at the time of the survey by the surveyor, and these items be immediately attended to
High priority	0-2 months	Items should be attended to as soon as possible - ideally within 2 months of the date of the survey.
Medium priority	2-6 months	Items should be attended to within 6 months of completion of the risk assessment survey.
Low priority	6-12 months	Items should be attended to within 12 months of completion of the risk assessment survey
Recommendation	None	Consideration for management

Control measures will be appropriately applied, and a program of monitoring and inspection will be implemented accordingly.

Records shall be kept on file by the responsible person for a period of at least five years.

Note – For low-risk properties a program of monitoring and inspection will not be implemented, due to disproportionate costs and potential disturbance to tenants,

however appropriate information will be made available through leaflets and through the website.

10. Intermittently / Infrequently Used Outlets

For taps, outlets, and showers that are used intermittently or infrequently (i.e. not used at least once every 7 days), a designated person shall flush the outlet by running the water for a minimum of 3 minutes. This activity will be recorded as part of the weekly health and safety check.

Where taps or outlets are identified as no longer required, this will be discussed with the Compliance Manager. Redundant outlets will be removed to prevent the creation of dead ends or dead legs within the water system. Once removed, the outlet will be taken off the weekly health and safety check and recorded in the next Legionella risk assessment.

During periods of temporary building closure, and where reasonably practicable, a flushing regime for hot and cold-water services shall be implemented. The person responsible for managing the closure will ensure that all outlets are opened regularly to minimise water stagnation and that these actions are recorded.

11. Legionella control measures

Effective Legionella control using temperature requires hot water to reach 50 °C, which poses a risk of scalding to certain groups of people. Where a risk of scalding is identified, suitable control measures will be put in place.

Control measures may include a number of options depending on risks:

- Immersion heaters are now fitted with overrun controls to prevent the risks of excessive temperature or pumping over in open vent domestic hot water systems.
- Fitting and maintaining thermostatic mixing valves to the appropriate standards.
- Individual care plans and supervision for vulnerable residents.
- Information and advice to residents, employees and visitors.

12. Training

Training for in house staff to perform specific tasks under this policy will be provided prior to taking up their role for completing testing of temperatures, flushing of outlets and monitoring of water supplies.

This training will be agreed with the Compliance Manager to ensure the correct level of competence is achieved.

13. Management of Contractors

Any contractor engaged by Cornerstone to undertake legionella assessments and associated works will be an approved contractor in line with the approved procurement process.

14. Co-operation and Co-ordination

Where premises are jointly occupied, then the arrangements for legionella assessments and testing will be coordinated, communicated and documented.

15. Resources / Support

Cornerstone has determined and provided the necessary resources for the establishment, implementation, maintenance, and continual improvement of this Legionella Safety Policy (LWSP).

The Executive Team has authorised the Compliance Manager to engage an external legionella safety consultant to support Cornerstone in fulfilling its duties, including the completion of legionella risk assessments and any associated remedial works.

The Compliance Team is responsible for collating all legionella risk assessments, issuing actions arising from each assessment, and monitoring the completion of all assigned actions.

16. Communication

This Policy will be disseminated to all designated colleagues during the induction by their line manager. A hard copy is available on request.

This policy will be held on Sharepoint for easy access for all colleagues and will always be available. It will also be attached to the IHASCO training course as a mandatory document for staff to read.

17. Internal Audit and Review

Quality of work is assessed in four ways:

- Assessment of a percentage of works by a suitably experienced and qualified officer
- Assessment by a nominated consultant as and when required, i.e. if there are concerns relating to safety or the quality of the contractor's work/practice's
- Internal quality assurance by the contractor
- The condition and performance of all systems need to be monitored. The appointed responsible person oversees and manages this, or where appropriate, an external contractor or an independent third party is appointed.

Management involves:

- Checking the performance and operation of the system and its component parts
- Inspecting the accessible parts of the system for damage and signs of contamination
- Monitoring to ensure that the treatment regime continues to control to the required standard
- Internal auditing arrangements implemented by the contractor, which include the contractor's qualified supervisor officer reviewing all certifications arising from maintenance inspections and checking relevant information and results prior to submission. A sample of submitted records is checked for accuracy by appropriately qualified and experienced staff.

18. Equity, Diversity and Inclusion

Cornerstone aims to implement policies and procedures that support and meet the diverse needs of its stakeholders, ensuring that no one is placed at a disadvantage over others and to minimise, and if feasible, remove any disproportionate impact on the grounds of the nine protected characteristics under the Equality Act 2010

This policy operates without detriment to any colleague on grounds of gender, race, ethnic origin, nationality, age, disability, religion or belief, sexual orientation or work pattern.

Appendix 1

General information on Legionella:

Legionellosis is a collective term for diseases caused by legionella bacteria including the most serious Legionnaires' disease, as well as the similar but less serious conditions of Pontiac fever and Lochgoilhead fever. Legionnaires' disease is a potentially fatal form of pneumonia and everyone is susceptible to infection. The risk increases with age but some people are at higher risk including:

- People over 45 years of age
- Smokers and heavy drinkers
- People suffering from chronic respiratory or kidney disease
- People with diabetes, lung and heart disease
- Anyone with an impaired immune system

The bacterium legionella pneumophila and related bacteria are common in natural water sources such as rivers, lakes and reservoirs, but usually in low numbers. They may also be found in purpose-built water systems such as cooling towers, evaporative condensers, hot and cold water systems and spa pools.

If conditions are favourable, the bacteria may grow increasing the risks of Legionnaires' disease and it is therefore important to control the risks by introducing appropriate measures outlined in Legionnaires' disease - The Control of Legionella bacteria in water systems (L8).

Where does it come from?

Legionella bacteria are widespread in natural water systems, e.g. rivers and ponds. However, the conditions are rarely right for people to catch the disease from these sources. Outbreaks of the illness occur from exposure to legionella growing in purpose-built systems where water is maintained at a temperature high enough to encourage growth, e.g. cooling towers, evaporative condensers, hot and cold water systems and spa pools used in all sorts of premises (work and domestic).

How do people get it?

People contract Legionnaires' disease by inhaling small droplets of water (aerosols) suspended in the air that contain the bacteria. Certain conditions increase the risk from legionella if the water temperature in all or some parts of the system may be between 20-45 °C, which is suitable for growth it is possible for breathable water droplets to be created and dispersed e.g. aerosol created by a cooling tower, or water outlets 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

Appendix 2

Source of the bacteria

Legionella bacteria survive and multiply in water. It is widespread in natural fresh water, including rivers, lakes, streams and ponds and may also be found in wet soil. Airborne dispersal may occur when water droplets are created. There is a strong likelihood of very low concentrations of the bacteria existing in all open water systems, including those of building services.

The risk is related to the number and types of Legionella in the water at the point of use. Also, a large factor in risk within our buildings is the Hazards that promote proliferation of Legionella and aerosolisation of Legionella.

Guidance is incorporated from the following document:

- Approved Code of Practice and guidance Legionnaires' disease: The control of legionella bacteria in water systems.
 - Part 1 of this publication contains advice on your duties under the law.
 - Part 2 contains guidance on technical aspects of the assessment and control of Legionella risks.

Note: The above document should be consulted for more comprehensive information and guidance. The HSE website also contains further reference information and guidance documents.

Additional Guidance and Information can be found from:

- The Water Management Society.
- BSRIA (Building Services Research and Information Association).
- CIBSE (Chartered Institute of Building Services engineers).
- BS8580 2010 Risk Assessment for Legionella Control.