



Town Clerk: Caroline Leet

EDENBRIDGE TOWN COUNCIL

Legionella Management Policy

Adopted by full Council on 27 October 2025

Policy applicable to:

Council sites:

Doggetts Barn

Rickards Hall

The Depot

The Cemetery

Market Yard Public Toilets & Mess room

The Allotments (Swan Lane & Forge Croft (leased))

Leased sites:

Church House

The Pavilion

To be used with the Written Scheme of Control; and Legionella Risk Assessment.

1. Purpose

The purpose of this policy is to ensure that Edenbridge Town Council manages and controls the risks associated with Legionella bacteria in water systems across all council-owned and operated buildings, in compliance with:

- Health & Safety at Work etc. Act 1974
- Control of Substances Hazardous to Health Regulations (COSHH) 2002
- HSE ACOP L8 & HSG 274 Technical Guidance

This policy sets out roles, responsibilities, monitoring arrangements, and procedures to protect staff, contractors, visitors, and the public.

2. Scope

This policy applies to all buildings, facilities, and water systems owned, leased, or managed by Edenbridge Town Council, including:

- Public halls, pavilions, depots, toilets, allotments, and community buildings.
- Associated hot and cold water services, showers, irrigation tanks, storage vessels, heaters, and outlets.

3. Objectives

- To identify and assess sources of risk of exposure to Legionella.
- To prepare a written scheme of control and implement suitable measures.
- To assign clear roles and responsibilities.
- To provide training and competence checks for staff/contractors.
- To maintain records for statutory minimum periods.
- To review risk assessments and control measures at least annually.

4. Roles & Responsibilities

Duty Holder:

- Edenbridge Town Council as Employer/Owner- as the corporate employer and owner of the premises, holds ultimate legal responsibility under the Health & Safety at Work etc. Act 1974 and COSHH.

Nominated Person:

- The Town Clerk acts on behalf of the Council as the nominated individual with responsibility for compliance.

Responsible Person:

- A competent individual appointed by the Council to implement day-to-day management, monitoring, and record keeping. (Buildings Manager.)

Deputy Responsible Person:

- Nominated to cover absence and provide support.

Competent Contractors:

- Approved external providers engaged for risk assessments, sampling, and specialist remedial works.

All Staff & Volunteers:

- Must comply with instructions, report defects, and undertake training where required.

All Lease holders:

- Must comply with their duties, instructions, water checks, report defects, undertake training where required.

5. Risk Assessment

Legionella risk assessments will be completed for all water systems by a competent person, reviewed at least every two years or sooner if:

- System modifications occur, or
- There are changes in building use, or
- An incident/outbreak occurs.

6. Written Scheme of Control

The Council will maintain and implement a scheme of control, including:

- System description: diagrams, asset register, outlet locations.
- Control measures:
 - Temperature control (hot $\geq 50^{\circ}\text{C}$, cold $\leq 20^{\circ}\text{C}$).
 - Regular flushing of little-used outlets.
 - Inspection, cleaning, and disinfection of tanks, heaters, TMVs, outlets.
 - Removal of dead legs and redundant pipework.
- Maintenance schedule: monthly, quarterly, annual tasks.
- Incident response plan: actions in case of suspected contamination or positive Legionella sample.

7. Training & Competence

- All relevant staff, caretakers, and contractors will receive Legionella awareness training.
- Competency will be refreshed every 3 years or when duties change.
- Records of training and competence will be maintained.

8. Monitoring & Record Keeping

- Records should be retained throughout the period they are current and for at least two years afterwards.
 - Temperature monitoring logs.
 - Flushing records.
- Retain records of any monitoring inspection, test or check carried out, and the dates, for at least 5 years, including:
 - Tank/heater inspection and cleaning records.
 - Risk assessments (minimum 2 years).
 - Contractor reports and remedial works.
- Monitoring will be carried out by trained staff or competent contractors, and checked by the Responsible Person.

9. Incident Response

In the event of a positive Legionella result, outbreak, or suspected case:

1. Isolate the affected system(s).
2. Inform HSE/local public health authority as required.
3. Engage competent contractor for immediate disinfection and remedial works.
4. Undertake incident review and update risk assessments.

10. Review & Audit

- Policy reviewed annually by the Town Clerk/Duty Holder.
- Audit of monitoring records carried out at least once per year.
- Any deficiencies will be addressed promptly with documented corrective action.

11. References

- HSE ACOP L8: Legionnaires' disease – The control of Legionella bacteria in water systems (<https://www.hse.gov.uk/pubns/books/l8.htm>)
- HSG 274 Parts 1–3 (Technical Guidance).
- COSHH Regulations 2002.