Brunel University of London Legionella Management Policy
Policy ✓ Code of Practice… Guidance… Procedure…
Organisation-wide ✓ Local…
Approved by the University Health & Safety Committee
Chairperson Lucy Shirodkar Date October 15th 2026 Review date 2029
The purpose of presenting this document to the University Health & Safety Committee Changes in practice and/or legislation ✓ New policy document… Standard 3 year review…

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1. Purpose

Brunel University of London (BUoL) is committed to preventing and controlling the risk of exposure to Legionella bacteria arising from water systems and activities under its control. This policy establishes the University-wide framework for meeting duties under the Health and Safety at Work etc. Act 1974, the Control of Substances Hazardous to Health Regulations 2002 (COSHH) and the Management of Health and Safety at Work Regulations 1999, taking account of HSE Approved Code of Practice L8 and HSG274.

2. Scope

This policy applies to staff, students, contractors, visitors and others who may be affected by University activities, and to all premises and water systems for which BUoL has responsibility or control. It applies to the operation and management of those systems and to projects, maintenance, refurbishment, alteration or contracted works that may affect them. Where BUoL

does not control a water system, relevant managers must obtain appropriate assurance where University staff, students or activities may be affected.

3. Policy details

BUoL will assess and control foreseeable risks from Legionella through proportionate, risk-based arrangements. The University will ensure that suitable and sufficient Legionella risk assessments are undertaken and reviewed by competent persons; that each relevant building or water system has a suitable, current written scheme of control reflecting its particular risks; and that necessary preventive and control measures are implemented, maintained, monitored and reviewed. Identified deficiencies and actions arising from assessments, monitoring or assurance activities must be addressed and appropriately escalated.

The University's dutyholder arrangements, appointed Legionella Responsible Person(s), delegated authorities and operational responsibilities are established through formal appointments and the BUoL Written Scheme of Control of Legionella Bacteria. The key Legionella-specific accountabilities are summarised in Appendix 7. The Written Scheme defines the detailed requirements for risk assessments, maintenance, temperature and other monitoring, sampling where appropriate, records, corrective actions, escalation and emergency response. All persons with responsibilities under this scheme must familiarise themselves with this document.

Projects, maintenance, refurbishment, alterations and contracted works that may affect water systems must be planned and managed to identify and control Legionella risks before, during and after the work. Compliance with the relevant requirements of the BUoL Written Scheme of Control for Legionella Bacteria and the BUoL Management of Works Procedure is mandatory. Where construction work falls within scope, the Construction (Design and Management) Regulations 2015 apply.

Persons undertaking Legionella risk assessment, control, monitoring, maintenance or specialist work must be competent for the work assigned. External providers must be selected, supervised and evaluated on the basis of demonstrable competence and performance. Membership of relevant professional assurance schemes may support, but does not replace, an assessment of competence. Use of an external provider does not transfer the University's legal duties.

The University will ensure that relevant Legionella risk information and control requirements are communicated to affected persons and those managing or working on water systems, and that appropriate information, instruction and training are provided. The University will monitor the effectiveness of its arrangements, including contractor performance, through proportionate inspection, review, audit and management assurance. Results outside specified control limits, positive samples where sampling is undertaken, system failures and suspected cases or outbreaks must be promptly escalated and managed under the Written Scheme, including appropriate protective measures and statutory reporting where required. Records sufficient to demonstrate implementation must be retained. This policy will normally be reviewed every three years, or sooner following significant legislative, organisational or operational change, material assurance findings or a significant water-safety incident.

4. Responsibilities

4.1 University Council / Vice-Chancellor & Leadership Team

The University's senior leadership — including Council, the Vice-Chancellor and President, and the Executive Board/Leadership Team — hold ultimate responsibility for health and safety governance. They are accountable for setting the strategic direction of the University, ensuring it reflects statutory duties (e.g., under the Health and Safety at Work etc. Act 1974), and that adequate resources, oversight, and organisational frameworks are in place. They champion a culture of safety and continuous improvement across the institution.

4.2 Senior Managers

Senior Managers — including Directors, Associate Directors, Heads of Department, Executive Deans and equivalent roles — are responsible for translating policy into action within their areas of control. This includes implementing health and safety arrangements, ensuring risk assessments are conducted, supervising local operational committees, and making sure staff and students understand their health and safety duties.

4.3 Line Managers

Line managers and supervisors play a critical operational role in maintaining safe environments day-to-day. They must ensure risk assessments are current and recorded, oversee induction and training, supervise safe systems of work, inspect local activities, lead incident investigations, and escalate issues appropriately. They also make sure new equipment is assessed for hazards and that relevant controls and competencies are in place.

4.4 Individual Staff and Students

All staff and students are expected to take reasonable care for their own health and safety and that of others. This includes following University policies and procedures, cooperating with safety arrangements, reporting hazards, incidents or near misses promptly, and engaging in required training and consultations. Staff must also ensure work areas and routines are safe and support continuous safety improvement.

4.5 Contractors, Visitors and Others on University Premises

Contractors, visitors, and external partners must comply with Brunel's health and safety policies while on campus. Those responsible for arranging visits must ensure contractors and visitors receive relevant safety information and understand emergency procedures and local hazards.

4.6 Competent Health & Safety Support

Brunel's Health, Safety & Environment Team (HSET) provide specialist advice, support, and training. They facilitate risk assessment guidance, promote best practice, help interpret legislation, and

support organisational compliance activities. Managers and staff should seek specialist input where needed.

5. Legal and other requirements

• Health and Safety at Work etc. Act 1974

• Management of Health and Safety at Work Regulations 1999

• Control of Substances Hazardous to Health Regulations 2002 (COSHH)

• Construction (Design and Management) Regulations 2015, where applicable to works

• Water Supply (Water Fittings) Regulations 1999

• HSE Approved Code of Practice L8: Legionnaires' disease – The control of Legionella bacteria in water systems

• HSE HSG274 Part 2: The control of Legionella bacteria in hot and cold water systems

• BUoL Written Scheme of Control for Legionella Bacteria

• BUoL Management of Works Procedure

6. Appendix - Definitions

Legionella Responsible Person

The competent person formally appointed by the University to take day-to-day responsibility for implementation of the Legionella control arrangements. The appointment does not transfer the University's underlying legal duties.

Written Scheme of Control

The documented scheme for preventing or controlling the risk from exposure to Legionella, based on the findings of the risk assessment. It defines the management structure, communication pathways, allocation of responsibilities, control measures, monitoring and corrective actions.

Management of Works Procedure

The University operational procedure setting out how projects, maintenance and contracted works are planned, coordinated, authorised, evidenced and handed over where they may affect statutory compliance or building systems. "Management of Works" is an internal University term rather than a statutory legal term.

7. Appendix – Legionella-specific responsibilities

This appendix supplements, but does not replace or amend, the University-wide responsibilities in Section 4. Named appointments, system-specific responsibilities, detailed methods and escalation routes are recorded in the Written Scheme of Control and associated arrangements.

Dutyholder / University management

Ensure that legal duties for water systems within the University's control are discharged, suitable resources and governance are provided, competent appointments are made and adequate assurance is obtained. Where control is shared, responsibilities must be established and coordinated. Managers may be required to attend refresher training periodically.

Legionella Responsible Person and appointed deputies

Coordinate implementation and oversight of the Written Scheme within their formally assigned authority; ensure risk assessments, control arrangements, monitoring, records and corrective actions are appropriately managed and escalated. Appointment does not transfer the University's legal duties.

Those managing premises and water systems

Ensure water systems under their operational control are maintained and operated in accordance with the applicable Written Scheme; facilitate access, planned controls, remedial works and timely response to non-conformances. Individuals will b required to attend training and refresher training as appropriate.

Project sponsors, designers and persons commissioning works

Ensure changes to water systems are considered for Legionella risk, competent advice is obtained early, and relevant control, commissioning and handover requirements are met.

Specialist contractors and water treatment providers

Demonstrate competence; comply with the relevant Written Scheme and contractual controls; maintain accurate records; and promptly report out-of-specification results, failures, positive findings and other matters requiring action. Their precise duties must be defined in contracts and operational arrangements.

Senior and line managers, staff and students

Follow relevant information, instructions and controls; do not interfere with water-safety measures; and report suspected failures or concerns promptly through established channels.

Health, Safety & Environment Team

Provide competent health and safety advice and support governance, monitoring and assurance as appropriate, without automatically assuming ownership of water-system operations or statutory dutyholder functions.

The Written Scheme of Control must specify the detailed responsibilities, site/system applicability, operational monitoring and sampling criteria, response thresholds, escalation and emergency arrangements, recordkeeping and review mechanisms. This appendix does not prescribe those procedures.