

Legionella Management Policy

Audience:	Customers, Colleagues, Contractors, Stakeholders, Board Members
Policy Owner:	Executive Director of Existing Homes
Policy Lead:	Head of Building Safety
Approved by:	Executive Team
Approved date:	June 2026
Next review date:	June 2029

1. Context, purpose and scope of the policy

Context

Legionella bacteria are naturally present in water sources. However, the bacteria can multiply in purpose-built water systems where water is stored or maintained at temperatures that encourage growth. If inhaled through fine water droplets (aerosols), legionella can cause Legionnaires' disease and other forms of legionellosis.

We provide and manage homes and buildings where customers, colleagues, visitors and contractors use water systems under our control. We therefore have a legal duty to assess and control the risks associated with legionella bacteria in those systems.

We operate in accordance with the Health and Safety at Work Act 1974, the Control of Substances Hazardous to Health Regulations 2002 (COSHH), and the Health and Safety Executive's Approved Code of Practice (ACoP) L8 and associated guidance HSG274 (Parts 2 and 3), alongside recognised industry best practice.

Maintaining robust water hygiene arrangements is essential to protecting vulnerable customers and to ensuring compliance with regulatory expectations.

This policy forms part of Moat's statutory building safety compliance framework covering Fire, Legionella, Asbestos, Gas, Electrical, Lifts (FLAGEL).

Purpose

This policy sets out how we manage legionella risk in the water systems we are responsible for. It establishes our approach to risk assessment, risk control, record keeping, contractor management, customer advice and compliance monitoring.

It ensures that legionella risks are identified, assessed and controlled so far as reasonably practicable and that customers can feel confident their water systems are managed safely.

Scope

This policy applies to:

- Retirement and supported living buildings
- Buildings with stored or shared water supplies
- General needs homes where we are responsible for water systems
- Offices and other premises under our control
- Customers, colleagues, contractors and visitors using those buildings.

This policy does not apply to:

- Buildings or systems where we do not hold responsibility for water system management (in such cases, we seek appropriate assurance from managing agents or responsible parties).

Operational detail is set out in the Legionella Management Procedure.

2. Definitions

- **Legionellosis:** A collective term for diseases caused by legionella bacteria, including Legionnaires' disease and Pontiac fever.
- **Legionnaires' disease:** A severe form of pneumonia caused by Legionella pneumophila.
- **Legionella Risk Assessment:** A structured assessment of water systems to identify and evaluate the risk of legionella growth and exposure.
- **Dutyholder:** The person or organisation with responsibility for managing legionella risks under health and safety legislation.

3. How this policy supports our strategy

This policy supports the delivery of Moat's Corporate Strategy and related supporting strategies by ensuring that building safety risks are identified, controlled and monitored through robust compliance and assurance arrangements.

- Corporate Strategy
- Existing Homes Strategy
- Customer Strategy
- Building Safety Customer Engagement Strategy
- Value for Money Framework
- People and Culture Strategy

Effective water hygiene management protects customers from waterborne health risks.

4. Policy principles

We:

- Prioritise the health and safety of customers, colleagues and visitors in all water hygiene decisions.
- Manage legionella risks proactively and take prompt action where risks are identified.
- Take all reasonably practicable measures to prevent or control legionella risk.
- Ensure sufficient resources, competence and oversight are in place to deliver our legionella control responsibilities.
- Work collaboratively with competent specialists, contractors and statutory bodies to maintain high standards, along with our water management consultant.
- Provide clear advice to customers about managing water systems safely within their homes.
- Continuously improve water hygiene performance through learning, audit and regulatory engagement.

5. Aims and objectives

Aim: To ensure water systems under our responsibility are managed in a way that minimises the risk of legionella growth and exposure, protects health and demonstrates full compliance with relevant legislation, guidance and recognised best practice.

Objectives:

1. Maintain full compliance with relevant health and safety legislation, ACoP L8 and associated guidance.
2. Ensure legionella risks are identified and assessed through structured risk assessments.
3. Implement appropriate and proportionate control measures to manage identified risks down to a level that is ALARP (As Low As Reasonably Practicable).
4. Ensure remedial works are completed in a timely manner where risks are identified.
5. Maintain accurate records to evidence compliance.
6. Provide effective monitoring, reporting and independent assurance.
7. Provide customers with clear advice about water hygiene responsibilities within their homes.

6. Policy actions

Objective 1: Maintain full compliance with legislation and guidance

- We will comply with the Health and Safety at Work etc. Act 1974, COSHH Regulations, ACoP L8 and associated guidance.
- We will follow recognised industry best practice alongside statutory requirements.
- We will ensure sufficient financial and operational resources are allocated to manage legionella risks effectively.
- We will ensure colleagues responsible for legionella management receive appropriate training and maintain competence.
- We will cooperate with statutory bodies and regulators where required.
- Our water management consultant oversees Moat's compliance and process and provides support and guidance throughout.

Objective 2: Ensure legionella risks are identified and assessed

- We will arrange legionella risk assessments for buildings and water systems under our responsibility.
- We will ensure assessments are undertaken by competent specialists in accordance with recognised standards.
- We will review risk assessments regularly and when significant changes occur.

Objective 3: Implement appropriate control measures

- We will take all reasonably practicable measures to prevent or control legionella growth.
- Where risk assessments identify serious or imminent risks, we will take immediate action.
- Where lower-level risks are identified, we will implement proportionate control measures within agreed timescales.

Objective 4: Ensure remedial works are completed

- We will complete remedial works identified through risk assessments in a timely manner.
- We will monitor completion of actions and maintain oversight of outstanding items.

Objective 5: Maintain accurate records

- We will maintain comprehensive, accurate and up-to-date records of legionella risk assessments, monitoring activities and remedial works.
- We will ensure records are retained in accordance with regulatory expectations.

Objective 6: Provide effective monitoring and assurance

- We will operate internal monitoring and assurance arrangements to oversee legionella compliance.
- We will report compliance performance to the Executive Team, Audit and Risk Committee and Board.
- We will commission internal and independent audits as part of our building safety assurance programme.
- We will use audit findings, regulatory engagement and incident learning to continuously improve legionella management arrangements.

Objective 7: Provide customers with clear advice

- We will provide customers with advice on managing water outlets safely within their homes, including cleaning and flushing guidance.
- We will advise customers not to adjust hot water temperature controls that are set to prevent legionella growth.
- We will require access where necessary to complete inspections and remedial works.

7. Monitoring, reporting and review

The Executive Director of Property & Assets holds overall accountability for compliance with this policy.

The Head of Building Safety is responsible for ensuring appropriate monitoring arrangements are in place to oversee compliance.

Compliance is monitored through inspection programmes, action tracking, internal assurance reporting, contractor performance monitoring and periodic internal and external audit.

Building safety compliance performance is reported through the Keeping Our Customers Safe governance panel, with escalation through the Executive Team, Audit and Risk Committee and Board where required.

This policy will be reviewed every three years, or earlier if legislation, regulatory expectations or service delivery changes.

8. Equality, diversity and inclusion

This policy will be delivered in line with our Equality, Diversity and Inclusion Policy. An Equality Impact Assessment was completed for this policy and considered as part of the approval process.

9. Data protection

We use a risk-based approach to processing personal data to ensure that we assess any risks to privacy or to the rights and freedoms of people before commencing, commissioning or changing data processing activities. Our Data Protection Impact Assessment (DPIA) process was completed as part of the approval process.

10. Related legislation and regulations

- 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
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013

11. Related policies and procedures

- Legionella Management Procedure
- Fire Safety Management Policy
- Asbestos Management Policy
- Gas and Heating Management Policy
- Electrical Safety Policy
- Lift Policy
- Temporary Moves Policy

12. Customer engagement

We engaged with customers through our Repairs Forum to seek feedback on these policies. Overall, customers felt the policies were clear and comprehensive but highlighted that they can be detailed and would benefit from a more accessible summary. Feedback also emphasised the importance of clear communication about what these policies mean in practice, particularly where works may affect customers in their homes.

In response, we have made minor clarity improvements where appropriate and will develop a short, customer-friendly summary to support understanding. Feedback has been shared with relevant teams and has informed how we communicate building safety more broadly. The feedback loop has been closed with customers.

Document revision history

Date	Changes approved by	Details of changes made
Add your text here	Add your text here	Add your text here