church growth trust

PRACTICAL GUIDE

Legionella Risk Management for churches

November 2026

© 2026 Church Growth Trust

CONTACT DETAILS

Church Growth Trust
The Barn, Baines Lane, Seaton, Oakham, Rutland, LE15 9HP
01536 201339
enquiries@churchgrowth.org.uk
www.churchgrowth.org.uk

Church Growth Trust is the operating name of Church Growth Trust Limited, a registered charity no. 1138119, and a company limited by guarantee no. 07352319, registered in England

COPYRIGHT
This publication is the copyright of Church Growth Trust. If it is to be reproduced in whole or part it must not be for commercial gain and should clearly acknowledge Church Growth Trust with the following wording: "Reproduced with permission from Church Growth Trust. www.churchgrowth.org.uk". If extracts are to be used in another context, permission should be sought in advance by emailing enquiries@churchgrowth.org.uk or telephoning 01536 201339.

DISCLAIMER
Whilst every care has been taken in the preparation of this material, Church Growth Trust cannot be responsible for action taken or refrained from in reliance thereon. It is recommended that appropriate professional advice be sought in each relevant individual circumstance.

© Copyright Church Growth Trust 2026

CONTENTS

1.0 Introduction 4
2.0 Legionella 4
2.1 What is legionella? 4
2.2 What harm can legionella cause? 4
2.3 How does legionella spread? 4
2.4 Favourable conditions for legionella 4
3.0 Legal requirements 4
3.1 Management and control of the risk 4
3.2 Legionella Risk Assessment 5
3.3 Appointment of Responsible Person 5
3.4 Implementing a Written Scheme of Control 5
3.5 Record keeping 5
3.6 Action plan 5
4.0 Additional resources 6

1.0 Introduction

This practical guide is prepared to inform churches of their legal duties as regards managing the potential legionella risk at a building. The guide will set out some basic background information on legionella and the risk that it can pose, and the steps that churches must follow to ensure that they manage the risk in accordance with legislation.

2.0 Legionella

2.1 What is legionella?

Legionella is a bacteria which is found naturally in freshwater environments such as lakes and rivers, but usually in low numbers. Given the natural occurrence of the bacteria, it may also contaminate and grow in purpose-built water systems in buildings. Whilst it exists at harmlessly low levels outdoors, legionella can become a dangerous public health hazard when it enters a buildings water system and thrives in warm, stagnant water.

2.2 What harm can legionella cause?

The illnesses caused by legionella are collectively known as 'Legionellosis' and are pneumonia-like in nature. The most serious of these illnesses is 'Legionnaires disease', a potentially life-threatening form of pneumonia which requires prompt treatment with specific antibiotics. There are similar, less serious, conditions such as 'Pontiac fever', a flu-like illness which does not affect the lungs, and typically clears up in a few days without medical treatment.

2.3 How does legionella spread?

People can get infected by inhaling tiny airborne water droplets (aerosols or mist) which are contaminated with the bacteria. The common sources for this would include showers, taps, hot-tubs, cooling towers (used in industrial air conditioning systems) and decorative foundations. Legionella does not typically spread from person to person, and you cannot catch it from drinking standard tap water, as it must enter the lungs rather than the stomach.

2.4 Favourable conditions for legionella

Legionella bacteria multiply rapidly in water temperatures between 20 and 45 degrees Celsius, especially where nutrients like sludge, scale or rust are present. The bacteria goes dormant below 20 degrees Celsius and are killed at temperatures above 60 degrees Celsius. This is why building operators have legal duties to manage water systems by storing hot water above 60 degrees Celsius and keeping cold water below 20 degrees Celsius, and regularly flushing out infrequently used taps/other outlets to prevent stagnation.

3.0 Legal requirements

3.1 Management and control of the risk

The individuals or group of trustees in control of a church building hold a legal responsibility as the 'Duty Holder' to manage and control the risk of legionella under UK health and safety legislation. This is the case even if a church has no paid employees and relies entirely on volunteers. Several legal duties must be met to comply with the Health and Safety at Work etc. Act 1974, the COSHH Regulations, and the HSE's Approved Code of Practice (ACoP) L8. The actions required to fulfil these duties are set out in the following sections.

3.2 Legionella Risk Assessment

The Duty Holder for a church premises must arrange for a suitable and sufficient legionella risk assessment for the buildings water system to be carried out. All church properties regardless of their size require a legionella risk assessment to be in place. The Health and Safey Executive (HSE) does permit the Duty Holder to perform this assessment themselves if they are competent to do so, and if the existing water system is very basic in nature. However, if the building is large, or has complex systems including water storage tanks, complex pipework, showers, total immersion baptismal pools, ornamental water features or evaporative cooling systems, a professional third-party assessor must be used to ensure compliance. The risk assessment will explicitly state what ongoing checks/monitoring need to occur (described under the written scheme of control below). The assessment must be reviewed regularly, typically every 24 months, or if there are changes to the plumbing configuration or how the building is used.

3.3 Appointment of Responsible Person

The Duty Holder within the church must formally nominate a 'Responsible Person'. This individual will handle any required monitoring, testing and arranging of any maintenance required to keep the water system safe. The responsible person must be given the appropriate information, instructions and training to be able to carry out the role correctly.

3.4 Implementing a Written Scheme of Control

If the risk assessment identifies any foreseeable risk, you must implement a written control plan. The use pattern of church buildings may mean that buildings sit empty between services, and the hot and cold water system will drift towards ambient temperatures, creating an ideal breeding ground for bacteria. Typical controls may include managing the storage and delivery temperature of water, periodically flushing of infrequently used water outlets, the removal of dead-leg pipework and the cleaning and descaling of taps, shower-heads or any water tanks. Beyond kitchen and toilets, church buildings may have unique high-risk elements such as baptismal pools, which will require strict filling, draining and disinfection protocols.

3.5 Record keeping

If there are more than five employees operating from a church building, it is a legal requirement to keep written records of the legionella risk assessment conducted, your written control scheme, and all temperature logs or flushing records. Even if there a less than five employees, the keeping of a logbook is still strongly advised by the HSE as proof that you are meeting with your common-law duty of care. Any records of monitoring results must be kept for at least five years.

3.6 Action plan

The record keeping described in the previous point is only useful if someone is reviewing and acting upon the numbers when required. The law requires the Duty Holder to act if the records reveal a problem. A clear protocol should be established for when a test fails. For example, if records show that the hot water at a kitchen tap has only reached 42 degrees Celsius instead of the required 60 degrees Celsius, your scheme must show that this anomaly was reported, investigated (e.g. checking the boiler settings) and resolved. Not taking action upon logs that show failing temperatures creates significant legal liability.

4.0 Additional resources

Below are some links of additional resources on the topic of legionella which may be useful for church Duty Holders as additional reading around the topic.

- HSE - Webpage on legionella and legionnaires disease www.hse.gov.uk/legionnaires
- HSE – The control of legionella bacteria in water systems, approved code of practice and guidance (L8) https://www.hse.gov.uk/pubns/books/l8.htm
- HSE – Legionnaires disease – Technical guidance (HSG274) https://www.hse.gov.uk/pubns/books/hsg274.htm
- HSE – Sample recording sheets https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.hse.gov.uk%2Flegionnaires%2Fassets%2Fdocs%2Fsample-recording-sheets.doc&wdOrigin=BROWSELINK