



WATER

Legionella Control
& Water Hygiene

A guide to Routine Control Measures



Understanding the Risk

Routine control measures are the day-to-day activities that keep water systems safe, stable, and compliant. While risk assessments identify potential hazards, it is routine monitoring and maintenance that actively prevent conditions where Legionella can grow.

Legionella bacteria thrive in systems where water is stagnant, temperatures are uncontrolled, or maintenance is inconsistent. Without regular intervention, even well-designed systems can quickly fall out of control. Routine control measures ensure that these risks are continuously managed.

Typical control measures focus on maintaining conditions that prevent bacterial growth, including:

- Temperature control to keep water outside of risk ranges.
- Regular flushing to prevent stagnation.
- Cleaning and maintenance of outlets and system components.
- Inspection of tanks and equipment to ensure system integrity.

These activities are not standalone tasks. They are part of a structured programme informed by the Legionella risk assessment and tailored to the specific system.

Routine control measures provide reassurance that systems are being actively managed, not just assessed. They also create a consistent record of compliance, demonstrating that control measures are in place and functioning as intended.

Without routine control, risks can develop quickly and go unnoticed. Consistent monitoring and maintenance are therefore essential in ensuring water systems remain safe for ongoing use.

The Legal Framework and Duty of Care



Routine control measures are a key requirement within the UK's legal framework for managing Legionella risk. They demonstrate that organisations are not only identifying risks, but actively controlling them on an ongoing basis.

HEALTH SAFETY AT WORK and COSHH

Under the Health and Safety at Work etc. Act 1974, organisations must protect employees and others by preventing the growth and spread of Legionella in water systems. This duty is reinforced by COSHH, which require the prevention or control of exposure to hazardous biological agents. Practical compliance involves a consistent programme of routine monitoring, maintenance, and cleaning to ensure the system remains safe and compliant.

ACOP L8 and HSG274

Guidance set out in ACOP L8 and HSG274 makes it clear that identifying risk is only the first step. Control measures must be implemented, monitored, and recorded. These documents define expected practices such as temperature monitoring, flushing regimes, and system inspections, all of which form part of routine control.

For organisations, this means routine control measures are essential for demonstrating compliance. They provide evidence that systems are being actively managed in line with legal expectations.

Responsibilities linked to routine control measures include:

- **Implementing monitoring and maintenance routines based on the risk assessment**
- **Ensuring tasks are carried out at the correct frequency**
- **Recording results and maintaining accurate documentation**
- **Identifying and responding to any issues or deviations**
- **Ensuring competence through training or specialist support**

These responsibilities sit with the duty holder, supported by competent individuals responsible for day-to-day system management.

In healthcare environments, HTM 04-01 sets stricter expectations for routine control measures, requiring more frequent monitoring and tighter control limits due to increased risk to patients.

Failure to maintain routine control measures can lead to loss of system control, increased Legionella risk, and potential enforcement action, making them essential for ensuring risk assessments are effectively applied in practice.

Routine Control Measures in Practice

Routine control measures follow a structured approach designed to maintain safe system conditions and prevent the development of risk. These activities are carried out at defined intervals based on system requirements and risk levels.

Typical routine control measures include:

01

Temperature Monitoring

Regular checks to ensure hot and cold water systems are operating within safe temperature ranges.



02

System Flushing

Routine flushing of outlets to prevent stagnation and maintain water movement throughout the system.



03

Outlet Cleaning and Disinfection

Periodic cleaning of taps, showers, and associated components to remove scale, biofilm, and contamination.



04

Tank and System Inspections

Visual checks of storage tanks and system components like expansion vessels and calorifiers to ensure they remain clean, secure, and in good condition.



05

TMV Monitoring and Maintenance

Inspection, testing, and servicing of thermostatic mixing valves to ensure safe and accurate temperature control.



06

Record Keeping and Review

Documentation of all monitoring and maintenance activities, supporting compliance and identifying trends over time.



These measures are typically carried out on a weekly, monthly, quarterly, six-monthly, or annual basis depending on system requirements. The exact schedule is defined by the Legionella risk assessment. Routine control measures are not isolated tasks. They work together to maintain system stability, providing continuous oversight and early identification of potential issues.

The Routine Control Timeline

Routine control measures must follow a structured schedule to ensure water systems remain safe and compliant over time. This schedule is based on the level of risk and the requirements identified within the Legionella risk assessment.

A typical timeline includes:

01

Weekly Tasks

Flushing of infrequently used outlets to prevent stagnation.



02

Monthly Tasks

Temperature monitoring and general system checks to confirm safe operating conditions.



03

Quarterly Tasks (3 Monthly) Tasks

Cleaning, de-scaling, and disinfection of outlets, along with additional system maintenance where required. Flushing of expansion vessels to reduce sediment and biofilm build-up, while also minimising stagnant water levels



04

6 Monthly Tasks

Inspection of tanks and key system components to ensure integrity and cleanliness.



05

Annual Tasks

More comprehensive maintenance, including system cleaning, disinfection, and supporting activities linked to overall compliance.



06

Ongoing Monitoring

Sampling continues as part of a long-term water hygiene programme, ensuring systems remain safe and compliant.



Maintaining a consistent sampling timeline ensures that water quality is continuously verified, supporting proactive risk management and compliance.

Spa Pools & Hot Tubs

– Additional Risk Considerations

Routine control measures for spa pools and hot tubs require a significantly higher level of management compared to standard water systems. Warm water temperatures, aeration, and frequent user interaction create ideal conditions for rapid bacterial growth, meaning control measures must be consistent, with greater frequency.

Unlike typical water systems, spa pool control is continuous and hands-on. Key parameters such as disinfectant levels and pH must be checked multiple times throughout the day to ensure the system remains within safe operating limits. Maintaining effective disinfection is critical, as even short periods of imbalance can allow bacteria to develop.

Regular system operation also forms part of routine control. Filtration and circulation must be maintained to ensure effective turnover of water, preventing stagnation and ensuring disinfectants are evenly distributed. Any issues with circulation or filtration can quickly lead to loss of control and increased risk. Cleaning is another essential component. Spa systems require frequent cleaning of surfaces, outlets, and internal components to prevent the build-up of biofilm, scale, and contamination. This includes scheduled drain-downs and deep cleaning at defined intervals, as well as routine maintenance of filters and associated equipment.

User management also plays a role in routine control. Bathing introduces organic matter and contaminants into the water, which can impact water quality and disinfection effectiveness. Control measures must therefore account for usage levels and ensure systems are maintained accordingly.

All routine activities must be supported by accurate record keeping, with checks, results, and actions documented clearly. This provides evidence of compliance and allows for ongoing review of system performance.

Due to the higher risk associated with spa pools and hot tubs, routine control measures must be more frequent, more detailed, and more responsive than standard water hygiene practices. Consistent application of these measures ensures water quality remains stable, risks are minimised, and systems operate safely in line with recognised guidance.

Routine Control Measures with SAS Water Ltd.

Routine control measures are essential for maintaining safe and compliant water systems. Without consistent monitoring and maintenance, risks can quickly develop and compromise system safety.

SAS Water Ltd

Provides provides structured monitoring programmes, routine maintenance services, and full compliance support tailored to your organisation.

Contact us today

To ensure your routine control measures are effectively managed and your water systems remain safe and compliant.



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