

## THE FM MANAGER'S LEGIONELLA COMPLIANCE CHECKLIST

10 things your water treatment contractor should be doing — but probably isn't

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If you are responsible for buildings, you are accountable for what is in the water. A Legionella outbreak, an HSE improvement notice, or a failed compliance audit doesn't just affect the building — it affects careers, reputations and the safety of the people inside.

Use this checklist to find out where your buildings stand — right now.

*Tick each box honestly. Any unticked item is a potential liability. Three or more unticked items means you have a compliance gap that needs addressing urgently.*

### SECTION 1 — DOCUMENTATION & WRITTEN SCHEMES

- 1 A current, site-specific Written Scheme of Control (WSC) is in place**  
Must be specific to your building and updated whenever the water system changes. A generic template does not satisfy L8 requirements. **HIGH**
- 2 Your Legionella risk assessment has been reviewed within the last two years**  
HSE guidance requires regular review and reassessment whenever there is reason to suspect the assessment may no longer be valid — including any changes to the building or systems. **HIGH**
- 3 Risk assessments cover ALL relevant water systems on site**  
This includes domestic hot and cold water, cooling towers, spas, swimming pools and any other systems presenting a Legionella risk. Missing a system is not a defence. **HIGH**

## SECTION 2 — CONTRACTOR OVERSIGHT & MONITORING

- 4 You have reviewed your contractor's monitoring records in the last three months**  
 Signing off contractor reports without reviewing them is not compliance. As Responsible Person, you are accountable for the results — not just the paperwork. **HIGH**
- 5 Temperature monitoring results are within L8 acceptable limits**  
 Hot water must reach 60°C at the calorifier and 50°C at outlets within one minute. Cold water must remain below 20°C. Consistent failures require immediate investigation. **HIGH**
- 6 Remedial actions identified by your contractor are being closed out promptly**  
 Outstanding remedial actions — particularly temperature control failures — represent unmanaged risk. A log of open actions with no completion dates, and no record of the actions carried out to achieve close out, is a red flag. **HIGH**
- 7 Your contractor's reports include analysis results, not just visit records**  
 A report confirming a visit took place is not the same as one confirming the system is safe. Results, trends and recommendations must be documented. **MED**

## SECTION 3 — RESPONSIBLE PERSON & TRAINING

- 8 A named, competent Responsible Person is formally appointed in writing**  
 The RP must have sufficient authority, knowledge and resource to fulfil the role. A verbal appointment or job title alone is not sufficient. **HIGH**
- 9 The Responsible Person has received appropriate Legionella awareness training**  
 Training should be documented, relevant to the systems they oversee, and refreshed periodically. Competence cannot be assumed from FM experience alone. **MED**
- 10 You have independent oversight of your water treatment contractor's performance**  
 Your contractor works for you — but who checks their work? Independent audits provide assurance that cannot come from the contractor themselves. **MED**

SCORE	WHAT IT MEANS	RECOMMENDED ACTION
10/10	Strong compliance position	Book an independent audit to confirm and document your position
7–9/10	Some gaps present	Address outstanding items and seek independent review
4–6/10	Significant compliance gaps	Take immediate action — prioritise HIGH risk items first

Under 4	High risk position	Contact an independent consultant as a matter of urgency
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## NOT SURE HOW YOUR BUILDINGS MEASURE UP?



Book a free 30-minute compliance review call with Matthew Dukes.  
No sales pitch. No obligation. Just an honest assessment of where you stand.

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Dukes Consulting Ltd | Independent Legionella & Water Compliance Consultancy | UK Wide | Full Member — Water Management Society (WMSoc) | Member — Pool Water Treatment Advisory Group (PWTAG)

This checklist is provided for guidance purposes only and does not constitute formal legal or compliance advice. Always consult a competent specialist for site-specific risk assessment and management.