

David G Cluett & Son LCA Statement of Compliance

Scope The scope of the activities associated with Legionella Control Management include: Legionella Risk Assessments of Hot & Cold Water Systems, Hot & Cold Water Monitoring and Inspection Services, Cleaning & Disinfection Services, Plant & Equipment Services.

1. Allocation of responsibilities 1.1 Explain in detail the client's obligations under the legionella legislation. Legionella Management Procedure describes the legislative obligations and scope of responsibilities associated with Legionella control services. The company complies with and explains this in every quote sent to our clients:- : The Health and Safety at Work (General) (Guernsey) Ordinance, 1987, The Health and Safety Executive (HSE) 'Control of Legionella Bacteria in Water Systems in Guernsey Approved Code of Practice and Guidance'. The policy and appropriate procedures are communicated with all parties involved.

1.2 Identify those services covered by the contract and those which should be provided by the client to meet all current obligations Upon receipt of the request to quote via the general enquiry email or telephone the recipient clarify whether the required work falls within the scope of the company's capabilities. Work which does not fall within the scope will not be quoted/ undertaken and the customer will be informed. A visit to the Customer site is arranged if necessary, taking note of the building complexity and the enquiry requirements. The customer is then informed about the details of the requirements to be covered in order to deliver the service.

1.3 Formalise a written agreement detailing the respective responsibilities for each requirement. Legionella Control Policy and Management procedure describes general responsibilities for the management of legionella. This is supported by the quote information and contract details as agreed with the client.

1.4 State in the written agreement that the service provider has LCA registration for the service categories being provided Quote information states that the company has LCA registration for the service categories provided.

2. Training and Competence of Personnel 2.1 Arrange formal training programmes for service provider personnel associated with the control of provider personnel associated with the control of legionella bacteria - see current LCA Knowledge Matrix (LCA/MAT) as a guide. The company adopted LCA Knowledge Matrix as a guide for training programme for all employees responsible for delivery of Legionella Control Services. Training includes Legionella Awareness Training, on-site training and technical qualifications as required.

2.2 Have a system for assessing the competence of service provider staff, establishing their training needs and ensuring they are kept up to date with current best practice procedures Competence Requirements are based on the need, situation and the nature of risks involved. A competence Assessment has been developed and is part of the Training Matrix. Development of competence is based upon theoretical knowledge, practical and on-the-job training to include a period of supervised practice work, progress monitoring and evaluation of the understanding of operational methods. All employees are observed on site at least once a year for each aspect of work completed - this includes evaluation of work records, operational methods.

2.3 Assist the client to assess training needs of staff and then where requested advise as to how these can be met The company assists the client by discussing the training needs of any site staff who have responsibility for maintaining or managing the water systems. This is discussed during the annual review, or sooner if the need arises. We advise where any Legionella training providers can be contacted and will email the client a link to their website.

3. Control Measures 3.1 Have a management system to assess the requirements and ensure an appropriate programme of control measures is designed, implemented, monitored and maintained. Legionella Control Policy details the programme of control measures including: policy statement, summary of procedures and references to method statements. Procedures include topics like communications, emergency arrangements, corrective and preventative actions as well as design and construction, products and disinfection chemicals.

3.2 Have a system for verifying that corrective and preventive actions are implemented Legionella Management Procedure details the actions associated with control of corrective and preventive measures. The Company ensures that all actions are

implemented and remain effective. This includes management of defects and planned maintenance.

3.3 Ensure the programme of control measures satisfies as a minimum the LCA Standards for Service Delivery Program of control measures has been designed to comply with relevant legislative requirements and LCA Standards for Service Delivery to include the Policy, allocation of responsibilities, processes and methods.

4. Communication 4.1 Have management procedures to respond appropriately should the system operating conditions deviate from control criteria Legionella Management Procedure details reporting procedures to include positive legionella results which are dealt with as and when they arise. Customers are advised that any confirmed Legionella positive, from a final laboratory report must be reported via the local RIDDOR process. Action in the Event of a Legionella Positive Sample method statement is then communicated with the client and appropriate guidance is given. Emergency contact details are given within the quote information supplied to the client.

4.2 Agree with the client how the service provider would communicate with the client's nominated personnel in the event of any necessary actions.

Communication lines are established with nominated personnel available at the beginning of the contract agreement . Appropriate communications are established with the client dependant upon the works/action required. This is recorded in the Management procedure.

4.3 Bring to the client's attention any significant matters affecting the control of legionella of which he has become aware, beyond the responsibilities of the contract

Any significant matters affecting the control of legionella of which the Company become aware, beyond the responsibilities of water hygiene, are communicated to the client as detailed in our Management Procedure.

4.4 Formal staged escalation procedure to ensure that in the event of significant matters of concern

The procedure described in the Management Procedure contains stages of investigation and escalation of the significant matters of concern. The concerns must be firstly investigated and verified, then once confirmed, the escalation procedure is initiated.

5. Record Keeping

5.1 Indicate which records should be kept by both parties and where they will be kept. The Management Procedure lists the documented information required and the location of the controlled documents, work records and other relevant information. All records are kept in paper and electronic form. However the client is responsible for keeping their records safe and up to date in their WHLB. (Water Hygiene Log Book)

5.2 Establish with the client who will be responsible for the maintenance of these records All records are kept by the company in the secure files for at least 5 years from the termination of the contract - these are available to the client upon request. We do not keep copies of the site Log Books, only copies of the records of works undertaken. The client is responsible for keeping their records safe and up to date in their site Log Book/s.

6. Reviews 6.1 Establish a programme that will allow both parties to review formally, at least annually, all aspects of the agreement covering system management and the control of legionella. The Management Procedure states that the review meetings are carried out at least annually and at the beginning of each contract. Review covers all aspects of responsibilities, management and control measures. This is set out on a hard copy and given to the client.

7. Internal Auditing The Service 7.1 Have a management system to ensure that service provider compliance with each of these commitments is self-audited at least once a year and that a formal record is kept. The Management Procedure details the process for internal audit, responsibilities, frequency and scope. The procedure describes the process of carrying out the audits to include internal and external audits.

7.2 Establish a corrective action programme so that any non-compliance identified is corrected in a timely manner. The Management Procedure describes the corrective action procedures including responsibilities and follow up actions, reviews and records.

8. Sub-contractors 8.1 Have a management procedure to ensure that any subcontractor holds an independent registration under the Code of Conduct (see Definitions for the LCA definition of a sub-contractor); or

8.2 Where a sub-contractor is not LCA registered, implement additional controls and audits to ensure that all activities carried out are compliant with the Code of Conduct and any relevant legislation; and 8.3 Regardless of whether the sub-contractor is LCA registered or not, implement procedures and checks as necessary to ensure that the competency of the subcontract service provider is assessed in relation to the scope of service the sub-contractor is providing.

Only analytical services are subcontracted out. The Laboratory is UKAS accredited. A copy of their current certificate and details of their Accreditation is held on file and requested annually.

9. Distribution of the Code 9.1 Have a management system to ensure all clients to whom services are provided, associated with the control of legionella bacteria, receive a copy of the Code of Conduct and Certificate of Registration or are informed that the current documents are available on their website Code of Conduct and Certificate of Registration is sent by email to all clients.