

David G. Cluett & Son - Legionella Management Procedures

The purpose of this Management Procedure is to ensure that all services relating to the control of Legionella bacteria in water systems provided by DAVID G CLUETT & SON are undertaken in compliance with The Legionella Control Association's (LCA) Code of Conduct and Service Standards, and thus contribute to the Association's objective of Keeping Water System's Safe.

The related services offered by DAVID G CLUETT & SON are as follows:

Category 1: Legionella Risk Assessment services

Hot & Cold Water Services assessments are to be carried out entirely by trained and competent in house staff using DAVID G CLUETT & SON procedures and methods inline with BS8580/2019.

Category 3: Hot & Cold Water Monitoring and Inspection Services

Hot & Cold Water Monitoring and Inspection Services are carried out entirely by in house staff using DAVID G CLUETT & SON procedures and methods.

Category 4: Cleaning & Disinfection Services

Cleaning & Disinfection Services are carried out entirely by in house staff using DAVID G CLUETT & SON procedures and methods.

Category 7: Legionella Analytical Services

Samples of water for Legionella analysis are collected by in-house staff and analysed by an independent laboratory who are UKAS certification. Interpretation of sample results and advice to clients is undertaken in-house only.

Category 8: Plant & Equipment Services

The installation, refurbishment and servicing of plant and equipment associated with water systems is carried out by in-house staff.

PROCEDURE 1 - ALLOCATION OF RESPONSIBILITIES

1.1. Every quotation sent out must include the following clarifications regarding compliance with Guernsey specific requirements for controlling legionella, record keeping and clarification of our LCA membership status:

“Please note that you have a statutory obligation under “The Health and Safety at Work (General)(Guernsey) Ordinance, 1987 and must comply with the requirements for identifying, managing, monitoring of Legionella and retain your service records in accordance with the Health and Safety Executive’s Approved Code of Practice ‘The Control of Legionella Bacteria in Water Systems in Guernsey’ and The States of Guernsey Legionella Control Management Directive. You are responsible for maintaining appropriate records throughout the period which they are relevant and for at least 5 years afterwards.

In accordance with HSE ACoP L8, all water sampling analysis are subcontracted to UKAS accredited laboratory. DAVID G CLUETT & SON do not take ‘the lead’ with the control measures, we only provide services as instructed by the responsible person/ Duty Holder or his/her representative/s. “

1.2. For service contract quotations under registration category 3, DAVID G CLUETT & SON shall identify the services included in the contract and those which must be provided by the client to meet all current obligations – this must be done by itemising all specific and relevant obligations within the package of services within the quotation.

1.3. In order to formalise a written agreement detailing the respective responsibilities for each requirement DAVID G CLUETT & SON formalise a written agreement detailing the respective responsibilities for each requirement through the quotation and order process. Acceptance form the client will be either written, email or an official purchase order.

1.4. A list of categories that we are registered for must be included in each quotation sent to the client, stated as follows:

“DAVID G CLUETT & SON are registered with the Legionella Control Association for the following services:

- ***Category 1: Legionella Risk Assessment services***
- ***Category 2: Hot & Cold Water Monitoring and Inspection Services***
- ***Category 4: Cleaning & Disinfection Services***
- ***Category 7: Legionella Analytical Services***
- ***Category 8: Plant & Equipment Services”***

PROCEDURE 2 – TRAINING AND COMPETENCE OF THE PERSONNEL

2.1. Training needs must be established in accordance with the duties that each of the members of staff will be undertaking. In addition to knowledge-based training, on-site practical training for each task is to be carried out. All training requirements are detailed in our Competence Matrix which shows progress against the training programme.

2.2. 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 must be observed on site once a year for each aspect of work completed - this includes evaluation of work records and operational methods. Where there is doubt over the competence of a member of staff, increased competence assessments shall be undertaken until the matter is resolved. Said competency checks are to be recorded in the form of a Water Hygiene Technical Site Report

2.3. In order to assist our clients to assess what the training requirements for their own staff, a formal discussion must take place during our annual review meeting. Where necessary, DAVID G CLUETT & SON will refer our clients to an independent organisation that specialises in training, these recommendations will be given verbally and or followed up by an email should it be required.

PROCEDURE 3 – CONTROL MEASURES

3.1. DAVID G CLUETT & SON do not actively design control measures for service contracts delivered under registration category 3. Clients must be advised that a legionella risk assessment must be in place in which a scheme of control must be recommended by the assessor – this is then applied once in place. DAVID G CLUETT & SON carry out legionella risk assessments in-house, this then leads to assisting in the production of a written scheme of control and an on going management regime. At the start of a service contract, all tasks for the coming 12 months must be scheduled and their implementation monitored to ensure implementation. Task specific RAMS must be in place for all control scheme tasks included in each contract.

3.2. The control scheme within the risk assessment must be directly reflected in the scheme produced for the client and shall specify the various control measures and control parameters, and instruction how to use and carry out those measures. Throughout the service contract, DAVID G CLUETT & SON provide support to the client to ensure that any corrective actions to correct non-conformances are implemented – progress with this must be reviewed during our annual review meeting.

3.3. Task specific RAMS must be prepared for each service offered in accordance with the requirements of the LCA's Service Standards – these must be reviewed annually as part of the internal audit (see management procedure item 7).

PROCEDURE 4 – COMMUNICATION

4.1 All records of testing must be recorded in the site log-book and a Water Hygiene Technical Report (WHTR) produced as a summary of each visit – this has a section for highlighting “defects”. A copy of the WHTR must be issued to the client before leaving site and a copy returned to the office to enable the appropriate reporting and escalation to the client’s nominated person. Where a client authorises corrective action whilst we are on site, the defect and the action taken must be recorded in the log-book and WHTR. Positive Legionella sample results must be communicated with the client within 12 working hours of receipt of a result, especially where a count has been observed. Where a sample count exceeds 100 cfu/l the HSE must be notified in accordance with Health and Safety at Work (General) (Guernsey) Ordinance, 1987, Section 9 and Schedule 2 Part I (9) / RIDDOR.

4.2. Communication lines and reporting details (contact names, numbers and email addresses) must be established and recorded at the beginning of the contract with the client to ensure that we can respond appropriately in the event of system control parameters deviating from the control requirements, and any other concerns that may arise during the contract.

4.3. Any matters of concern with regard to legionella control that fall outside our contractual agreement and responsibilities must be noted on the WHTR for the client’s attention. If relevant, management must follow up with an email and provide guidance on appropriate action.

4.4. In order to ensure that significant matters of concern are escalated as required, a director of DAVID G CLUETT & SON will consider the need to escalate with a phone call or site visit with the Responsible person and confirmed in an email. Failure of the Responsible Person to act within an agreed period of time in proportion to the risk must result in a discussion with the client’s Duty Holder, again confirmed in an email. If the Duty Holder fails or refuses to act appropriately and a serious risk to public health is believed to exist then the Director should decide to consult the HSE. The LCAs escalation letter template must be used for the final stage of escalation and shall be both emailed and posted to the HSE.

PROCEDURE 5 – RECORD KEEPING

5.1. The responsibility of good record keeping shall be the onus of the client as detailed in our quotation template – the client is informed that they are responsible for all records under the scheme of control. We must keep records of works undertaken by ourselves, including WHTRs which detail defects, and records of any meetings, as well as all relevant contract and communication detail.

5.2. As detailed above, the client is informed at quotation stage that they are solely responsible for maintaining all records in accordance with statutory requirements.

PROCEDURE 6 – REVIEWS

6.1 Face to face contract reviews must be carried out with service contract clients at least annually to discuss all aspects of the contract agreement and quality of service, and especially any outstanding or repetitive defects/non-conformances. In addition, client training needs shall be discussed. A record of the meeting must be kept and copied to the client for future reference.

PROCEDURE 7 – INTERNAL AUDITING

7.1. An audit must be carried out at least annually using the Internal Audit Form to ensure compliance with the LCAs Code of Conduct and Service Standard relevant to our categories of registration. The audit must review these procedures and associated records/documents and other evidence of compliance.

7.2 Any non-conformances identified must be given a completion date and appropriate action taken to address the issue within a reasonable timescale. Once complete, actions must be signed off on the Internal Audit Form.

PROCEDURE 8 – SUB-CONTRACTORS

Note: Laboratory analytical services are not considered to be sub-contracted, however an annual check must be made to ensure that any laboratory used for legionella analysis is appropriately UKAS accredited.

8.1. No work associated with the control of legionella is to be sub-contracted – if a client requests work that is not within the scope of DAVID G CLUETT & SON then they must be advised to refer to the LCA's website.

8.2. This procedure is not in use.

8.3. This procedure is not in use.

PROCEDURE 9 – DISTRIBUTION OF THE CODE

9.1. Upon receipt of the renewed Certificate of Registration and Code of Conduct from the LCA, a copy must be sent to all clients within 2 weeks.