

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

The LCA Member will:

1.1 Provide guidance to the service user on what they need to do to comply with the Law in respect of Legionella control.

Procedure: Allocation of responsibilities

Control document: Quotation Templates

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 letter sent to our service users:- 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 Formalise a written agreement identifying those services covered by the LCA Member and those which should be provided by the Service User to comply with the Law, Regulation, ACoP and the LCA standards for service delivery.

Procedure: Allocation of responsibilities

Control document: Quotation Templates

Upon receipt of the request to quote via the general enquiry email or telephone, the recipient will 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 may be 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.

2. Training and Competence

The LCA Member will ensure their staff delivering Legionella control services are competent to do so by:

2.1 Having a system to identify initial training needs and arrange training for their staff associated with the control of Legionella.

Procedure: Training & Competence

Control document: Training Matrix

The company has adopted the LCA Knowledge Matrix as a guide for training needs 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 Having a system for assessing and maintaining the competence of their staff, establishing their ongoing training needs.

Procedure: Training & Competence

Control document: Training Matrix and Competence Report.

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 every two years for each aspect of work completed - this includes evaluation of work records and operational methods.

2.3 Maintaining records of training, competence assessments and annual competence validity checks

Procedure: Training & Competence

Control document: Training Matrix and Company Filing System.

The company shall maintain records of staff training and competence within an online Training & Competence file to detail formal training certificates, competence checks, CPD credits etc.. of each staff member. Each will then be updated on the Legionella Staff Training Matrix and reviewed for training requirements.

2.4 Having a system to ensure that developments in industry standards and good practice are identified and disseminated to all appropriate staff.

Procedure: Training & Competence

Control document: Email, Memberships and Method Statements

It will be the responsibility of the company director and Legionella Manager to monitor updates to relevant industry standards, general publications and best practice produced by the HSE, LCA, WHO, WMS etc.. and the credibility of such information will be confirmed prior to implementation.

3. Control Measures

The LCA Member will:

3.1 Register all Legionella control services they offer with the LCA and state in the written agreement that the LCA Member has LCA registration for the service categories being provided.

Procedure: Allocation of responsibilities

Control document: Quotation Templates

All services provided by the company that fall within the LCA defined categories will be registered with the LCA and formally audited annually for company reregistration.

Information of such membership and registered categories will form part of all quote letters or contracts issued to the service user.

3.2 Have a management system to gather information, assess the requirements and ensure an appropriate programme of control measures is designed, implemented, monitored and maintained that satisfies as a minimum the LCA Standards for Service Delivery.

Procedure: Control Measures

Control document: Monitoring Contracts Service Schedule & Service Reports.

Legionella Management Procedure details the actions associated with control 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 Have a system for checking that any recommended corrective, preventive and improvement actions are completed and effective.

Procedure: Control Measures

Control document: Monitoring Contracts Service Schedule & Water Technical hygiene reports

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.

3.4 Have a calibration and validation procedure to ensure that any testing equipment used in the field is operating correctly.

Procedure: Control Measures

Control document: Thermometer Traceability Sheet & Calibration Method Statement

All testing equipment will be calibrated to manufacturer, self calibration or National standard refer to Legionella Management Procedure for detailed parameters.

4. Communication

The LCA Member will:

4.1 Agree with the service user who the appropriate contacts are for routine and emergency communication and who the duty holder and responsible persons are.

Procedure: Communication

Control document: Client Engagement Letter

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

4.2 Have procedures to communicate appropriately when non-conformance from normal control limits or safe operation is identified.

Procedure: Communication

Control document: Water Technical Hygiene Report

Appropriate communications are established with the service user depending upon the works/action required. This is recorded in the Management procedure.

4.3 Bring to the service user's attention any matters affecting the control of legionella of which they have become aware, beyond the responsibilities of their service provision.

Procedure: Communication

Control document: Water Technical Hygiene Report

Any matters affecting the control of legionella of which the service provider becomes aware, beyond the responsibilities of the service provisions, are communicated to the service user in the form of a WTHR as detailed in our Management Procedure.

4.4 Have a staged escalation procedure to ensure that significant matters of concern are escalated, as necessary to the responsible person, the duty holder and, as a last resort to the relevant enforcement agencies.

Procedure: Communication

Control document: Water Technical Hygiene Report and Escalation Letter

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

The LCA member will have a procedure to:

5.1 Identify records that need to be maintained to provide evidence of legionella control.

5.2 Agree with the service user in writing which records should be kept by each party, where and how.

Procedure: Record Keeping

Control document: Quotation Templates, Management Procedure and Statement of compliance

The Management Procedure lists the documented information required and the location of the controlled documents, results of any monitoring, inspection, test or check carried out, the dates, any resulting corrective actions, work records and other relevant information. All records are kept in paper and/or electronic form. However the service user is responsible for keeping their records safe and up to date in the onsite logbook and/or external management system.

5.3 Maintain their own records, including all detail recorded in site records, for a minimum of five years following delivery of service provisions and make them available to the service user

Procedure: Record Keeping

Control document: All Records

Records and documents are kept either in electronic form within an individual "Customer Folder" within google drive or paper form. Customer records and documents are kept for at least 7 years starting from the expiry of the contract.

6. Reviews

Where LCA Members deliver onsite, ongoing Legionella control services they will have a procedure to:

6.1 Review formally, at least annually, all aspects of the service provision with the service user.

Procedure: Reviews

Control document: Service User Review Form

The Management Procedure states that the review meetings are carried out at least annually. The review covers all aspects of responsibilities, management and control measures..

6.2 Assist the client to assess the training needs of staff and then where requested advice as to how these can be met.

Procedure: Reviews

Control document: Service User Review Form

The Management Procedure states that the service users training requirements will be discussed and directed to appropriate training and/or training providers.

7. Internal Auditing The Service

LCA Members will have a procedure to:

7.1 Audit their own management system to ensure it complies with the requirements of the LCA Code of Conduct and Service Delivery Standards and keep a record of that audit.

Procedure: Internal Auditing

Control document: LCA Internal Audit Document

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 Audit a representative sample of output/records to assure the management system is effective and being correctly applied. This should include auditing records of all aspects of the service delivery (internal processes and on-site activity) delivery reports, reviews, etc., and keep a record of that audit.

Procedure: Internal Auditing

Control document: LCA Internal Audit Document

The Management Procedure details the process for auditing of records for quality assurance. The procedure describes the process of carrying out record audits by who and what instigates a document change.

7.3 Establish a corrective action programme so that any non-compliance identified is corrected in a timely manner including addressing procedures where failings are systemic.

Procedure: Internal Auditing

Control document: LCA Internal Audit Document

The Management Procedure describes the corrective action procedures including responsibilities and follow up actions, reviews and records.

8. Sub-contractors

The LCA Member will:

8.1 Check that every non-LCA registered sub-contractor has procedures to carry out adequate pre-work Risk Assessments and produce suitable Method Statements that comply with the LCA service delivery standards.

8.2 Review the competence assessments of those staff working on behalf of the LCA Member (LCA registered companies are required to carry out competence assessments and provide them on request and would be subject to the complaints procedure where these cannot be readily provided).

8.3 For instances where a non-LCA registered sub-contractor cannot provide records of staff competence assessment for the work being carried out the LCA Member is to conduct a documented assessment of the sub-contractor's capability to carry out the work and the competence of their staff who will be carrying out the work. This is to be validated annually or at any point where there is reason to doubt the sub-contractor's performance.

8.4 Include subcontractor activity in the evidence examined in their internal audits under commitment 7 to ensure that all aspects (scoping, quotation and delivery) are compliant with the LCA Code of Conduct and Service Delivery standards.

Procedure: Subcontractors

Control document: N/A

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.Promoting Awareness of the LCA

9.1 A copy of the LCA Code of Conduct and Certificate of Registration are made available to all Legionella control service users. This can be achieved either by providing them hard copies, electronic copies or making them available as downloadable files from their website or links to the LCA website.

Procedure: Promoting Awareness

Control document: All quotes and communications letters

All quotes provided to service users will note the availability of the LCA Code of Conduct, Certificate of Registration on the LCA Members company website.

“A copy of our certificate of registration can be found on our website:

www.heatingandcombustionsolutions.co.uk

A copy of the LCA’s Code of Conduct can be found on their website:

www.legionellacontrol.org.uk”