



Water Monitoring Ltd LCA Statement of Compliance

This Statement of Compliance details how we Water Monitoring Limited conduct business operations to fulfil all service provider commitments set out in the code of practice and how we endeavour to ensure that our practices and procedures provide our clients with a service that is fully compliant with current legislations and guidance; in particular the HSE Approved Code of Practice and guidance document Legionnaires' disease: the control of Legionella bacteria in the water systems ACOP L8 (4th edition) 2013 and HSG274 Parts 2 and 3. The services we provide are Legionella risk assessments, hot & cold water system monitoring, inspections, plant & equipment and analytical services which are delivered by our Water Hygiene Consultant and dedicated operatives supported by an admin team.

Item 1.0. Allocation of Responsibilities

- 1.1. We ensure that our clients are advised of their general duties under the Health and Safety at Work etc. Act 1974, and specifically in relation to the risks associated with the Legionella bacteria that may arise from the site and work activities. Each client is advised that they can obtain more information from the HSE website, our website and from the ACoP L8, and the Control of Substances Hazardous to Health Regulations 2002 as amended ACoP L5 (6th Edition) 2013 (COSHH) and relevant sections of the Management of Health and Safety at Work Regulations 1999 (MHSWR). We discuss and explain verbally the client's obligations, with further information presented in written form via advice and quotation documents as our management system process (WMLD01).
- 1.2. Following discussions with existing or potential clients a formal quotation/programme of works which will identify all the services offered by our Company will be provided. The scope of works are discussed with the client with all works agreed and signed for on the quotation or programme as applicable. Where required purchase orders are supplied by the client. Our programme of works is designed to meet the Law, Regulation, ACoP and the LCA standards for service delivery and itemises the obligations that the client is recommended to meet. The services and potential scopes of works noted above are provided by Water Monitoring Limited and are clearly stated in the service quotation and programme of works. Part of the quotation is to clearly define the allocation of responsibilities between us as the service provider and the client, explaining the relevant legislation and recommended actions to ensure compliance. (WMLD01). The contract is deemed to be our quotation together with an instruction from the client to proceed.

Item 2.0 Training and Competence of Personnel

- 2.1. All staff are assessed in line with the training & competency procedures and training will be assessed to ensure it is in line with the recommendations within the LCA skills matrix in relation to the job role that is required of the individual. It will also meet health & safety requirements. We carry out operatives training in line with our in-house training programme (WMLD14) Competency assessments are on-going to assess the operatives against the LCA skills matrix recommendations and these form part of the on-going training programme. (WMLD15). All training is identified and planned and recorded on the Training Record spreadsheet.
- 2.2. Competency and skill level is assessed and tool box talks will supplement any formal training. This will be based on the current areas of work and operatives are assessed within the categories relevant to their level of experience and the tasks they are being asked to perform as part of their job role. (WMLD15) Competency assessments are typically undertaken annually by the Water Hygiene Consultant for the field-based staff and by the Director for the admin staff. The Water Hygiene Consultant is kept up to date by being a member of the Water Management Society. An external consultant is used to confirm the competency of the Water Hygiene Consultant.
- 2.3. We maintain records of training, competency assessments for a period of 5 years for all staff in our personnel files. (WMLD14 & WMLD15)
- 2.4. We are made aware of Industry Standards and good practice updates by membership of the Water Management Society, the LCA and these are provided to staff at the regular Health & Safety meetings, with toolbox talks as applicable. (WMLD14)



Item 3.0. Control Measures

- 3.1. Within the quotation it is stated that our Company holds LCA registration for the services we provide. (WMLD01) In accordance with the LCA's service standards our Company carries out the following works:
- Legionella Risk Assessments;
 - Monitoring and Inspection services;
 - Cleaning and disinfection services;
 - Training Services
 - Legionella Monitoring Services;
 - Plant and Equipment;
- 3.2. In discussions with existing and new clients we prefer to assess and review the requirements of the client by carrying out a Legionella Risk Assessment or Review. We would advise that an up to date risk assessment is recommended by the ACoP L8 and that this will list written control measures for the water systems within their site. Where there is a recent assessment this will be requested so the water hygiene programme can be based on the recommendations made within the document. If additional information is required a visit will be completed by the Water Hygiene Consultant to survey the site. Following the assessment or review we identify the procedures that the client should instigate and ones that we can complete, if required. We provide the most practical and effective advice through discussions and written information. This will take the form of a control scheme based on the requirements for the site in relation to the recommendations with L8 & HSG274. These discussions will centre around the operational suitability of the options available, such as sites that need to remain operational and those that are empty. All services will be in line with method statements and risk assessments specific to the individual scope of works. All regular services provided by Water Monitoring Limited are recorded on our computer systems by the admin staff. Where a service alert is raised the client is contacted to arrange for the scheduled works to be booked. If the client cannot book the works in or decides not to proceed with the recommended service, Water Monitoring Limited formally advise the client of the compliance issues this may raise. This is via email and a follow-up letter and is sent by the admin staff. Confirmation that the works have been carried out is completed by the admin staff. (WMLD01)
- 3.3. Where log books are held and as agreed with the client, onsite records and defect reports are updated at each visit. Following each visit a work report is submitted to the client contact following the visit for their records and to detail any items that require further attention or recommendations for further works. Any issues should be followed up prior to the next scheduled service visit, if an agreement on changes / works is not made after the visit. This information is completed by the admin staff in conjunction with the Water Hygiene Consultant. (WMLD01)
- 3.4. Water Hygiene testing equipment to be calibrated and certificates maintained. Thermometers are calibrated against a standard reference and pH meters are calibrated in field using standard buffers. (WMLD29)

Item 4.0. Communication and Management

- 4.1. The appropriate contacts for all service users are obtained using (WMLD27A/B) to ensure that communication is directed to the right person within the organisation. The agreed reporting contacts and details are captured during the initial survey using these forms. This information is then transferred to the contacts in the customer database by the admin staff. (WMLD01)
- 4.2. Where out of scope readings are obtained which may indicate that maintenance procedures have lapsed within the control measures set out in the Legionella risk assessment then we contact the client to discuss further. (WMLD01) Information on actions required to resolve or manage the issues is discussed. The client is advised that a review of the systems should be carried out to ensure control measures are reinstated or reviewed. This may also mean a review of the Legionella Risk Assessment should be undertaken, depending on the issues. In the event of any additional actions we communicate with the client and/ or their nominated contact in line with the reporting procedures defined by client for the reporting non-conformances to the client, usually a phone call and / or email. (WMLD01).



Water Monitoring Ltd LCA Statement of Compliance

- 4.3. Where we become aware of significant issues affecting the control of Legionella that are outside the agreed terms of our contract, these are brought to the client's attention by the admin staff. We then assist the client, where possible, to understand the issue and recommend the necessary actions to be taken to address the situation. Written advice is sent to the client with the necessary actions will also be issued. (WMLD01)
- 4.4. Formal staged escalation of significant matters of concern are raised to the identified responsible person and/or duty holder. Letters (WMLD024 & WMLD025) are sent to advise of issues as required by the procedure. (WMLD01)

Item 5.0. Record Keeping

- 5.1. The standard quotes (contract) identify the records that are to be maintained to support the Legionella control scheme. (WMLD01)
- 5.2. The standard quotation defines which records to be kept by each party; where and how. (WMLD01)
- 5.3. As part of the standard quotation format we advise the client that we maintain records of all activities on their site/s for 5 years. These are available to them for that period upon request. (WMLD01)

Item 6.0. Reviews

- 6.1 Annually we undertake a contract performance review with the client using Annual review form. (WMLD022) This is advised in the quotation for contract works and the review will be undertaken by the Water Hygiene Consultant. Any actions from the review meeting are logged on the Annual review form and sent to the customer for their actions if applicable. (WMLD01)
- 6.2 Where clients are identified as requiring further training to develop knowledge and understanding of their systems and requirements for the management and control of Legionella, we recommend training bodies who can help develop training for staff. (WMLD14) This is typically undertaken during the annual review meeting and is an agenda item on the standard annual review form (WMLD022).

Item 7.0 Internal Auditing

- 7.1 Admin staff for Water Monitoring Limited undertake an annual internal review of our LCA management procedures and method statements to ensure that the method statements still comply with the LCA standards. (WMLD01)
- 7.2 A representative sample of records from all aspects of the service delivery should be included in the audit to ensure the systems are effective and being applied. Any non-conformances are followed up to ensure that all actions are completed. This is followed up by the admin staff. Form WMLD03 is used to complete. Timescales identified within the internal audit for non-conformances are to be met (e.g. 3 /6/ 9 months). (WMLD01)
- 7.3 Corrective actions are undertaken this includes reviewing any procedure or policy affected by a non-conformance which will be reviewed and updated as required. (WMLD01)



Item 8.0. Sub-Contractors

- 8.1 WM Ltd currently use one external service provider that is not an LCA member for site work. We confirm prior to use that they issue risk assessments and method statements to meet the LCA standards of service delivery. We also use an UKAS accredited Laboratory to provide independent analysis of water samples. The water samples are collected by WM Ltd operatives (in accordance with the method statement) and taken to the Laboratory or agreed drop of location. The Laboratory UKAS accreditation is checked annually as part of the internal audit. (WMLD01)
- 8.2 If WM Ltd require additional services and sub-contractors are considered for any work then we will only use LCA registered contractors and confirm that they are registered for the services required by checking the LCA website. This will be done by the admin staff and the current certificate obtained. (WMLD01)
- 8.3 Where applicable the admin staff also obtain the employers competency assessment for the sub-contractor being used on WM Ltd sites. If this cannot be obtained then the Water Hygiene Consultant will undertake a initial competency assessment of the contractors staff and validate this annually. (WMLD01)
- 8.4 The internal audit is used to confirm the correct activities of any sub-contractor used. (WMLD01)

Item 9.0 Distribution of the Code

- 9.1. A copy of the code of conduct and evidence of our LCA membership is available via the LCA website, as advised in our standard quotes. (WMLD01)