EPSCO
SETTING STANDARDS IN WATER QUALITY

Cleaning
Disinfection
Inspection
Assessment
Consulting

LCA Code of Conduct – Statement of Compliance

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nqa ISO 9001 ISO 14001 ISO 45001 INTEGRATED MANAGEMENT
UKAS MANAGEMENT SYSTEMS 0015
Legionella Control Association KEEPING WATER SYSTEMS SAFE
Alcumus SafeContractor
Achilles UVDB AUDITED

Contents

1. Allocation of Responsibilities

1.1 Client guidance on how to comply with the Law in respect of Legionella control

As a responsible service provider, EPSCO has in place management system processes that ensure clients are aware of their obligations under Legionella legislation. Obligations are discussed and explained verbally during the service specification process, with further information presented in written form via formal written proposal and quotation documents as per Management System Process (MSP) #001. This MSP is incorporated into processes for provision of all relevant products and services. The following documents are available via the EPSCO & HSE websites: -

- The Control of Legionellosis: A Recommended Code of Conduct for Service Providers,
- HSE ACOP L8 (if the client does not already hold one)
- EPSCO LCA Statement of Compliance
- LCA Certificate of Registration

Clients should also reference the 1974 Health & Safety at Work etc Act, the Control of Substances Hazardous to Health Regulations 1999, the Management of Health and Safety at Work Regulations 1999 and Notification of Cooling Towers and Evaporative Condensers Regulations 1992 which can be found via the HSE websites.

1.2 Formalised Agreement and identification of services and responsibilities.

A formal written agreement is created through the issue of the scope of work proposal and quotation documents by EPSCO, and acceptance by the client through the issue of a work/purchase order. Detailed responsibilities, actions and job steps are included in these documents to help comply with the Law, regulations, ACoP and LCA standards for service delivery. This process is detailed in EPSCO MSP#001 and MSP#018.

2. Training & Competence

All aspects of training and competence are carried out in line MSP #012 –Training, competency, and personal development.

2.1 Identifying and Arranging training needs of staff

All EPSCO personnel are recruited through our Recruitment MSP#004 programme. They are recruited specifically to be trained to deliver individual or multiple tasks related to legionella control and water system management. We carry out operatives training in line with our in–house EPSCO Training Programme (F-HSQ67 & F-TP10) which develops operations staff through five stages over a five year period. All staff complete this training programme regardless of their initial level of Legionella knowledge or experience. This consists of internal training and modules from external providers (such as the WMS, City and Guilds etc.) that are organised into the five stages with reference to the LCA matrix modules: -

- Introduction to EPSCO
- Technician Level 2
- Technician Level 1
- Team Leader
- Project Manager

Regular refresher training and information is communicated through Team Meetings, Toolbox Talks and briefings delivered by management to the operations team. All staff are also regularly assessed and appraised as a minimum annually, with the process managed through a combination of a self-appraisal worksheet (F27) and a performance appraisal (F14). This allows us to make plans for the development of individual team members. Staff responsible for undertaking Legionella specific tasks are trained externally by accredited/certified training bodies and refresher training is carried out prior to certificate expiry or if deemed necessary.

2.2 Competence, Training & Best Practice

Competence through practical and desktop assessment is assured at each of the five stages of operational training, with an operative only being approved and certificated following successful demonstration of skills and knowledge (F-TP30 & F-TP31). In addition to these core competence levels our operations department also maintain a Task/Site Competency Matrix (F-TP84) to ensure our allocated teams possess the requisite skills and experience. On-going competence checks are also carried out as part of our monthly site inspections (F-HSQ33).

2.3 Records of training and competence

Records of competence and training are maintained in each staff member's training file, digital file and recorded on the training matrix F-TP06 and task competency matrix F-TP84. These are maintained in line with MSP#009 – Control of records and Data.

2.4 Communicating updates and developments in industry standards and good practice to staff

As an organisation we are members of The Institute of Water, The Water Management Society and The British Safety Council and subscribe to a number of publications relating to the industries in which we work including regular HSE regulatory email updates. We maintain a comprehensive library that covers Industry Standards, Codes of Practice, Health and Safety Legislation and Guidelines, and a broad-based Technical Reference Library covering all encountered areas. We have a communication procedure MSP038 that details what, when and who we communicate information to internally and externally. Information delivered to our personnel is recorded on F-HSQ67 – EPSCO Training Record.

3. Control Measures

3.1 LCA registration for services provided

EPSCO have registered the services we provide with the LCA. All service quotations explicitly state that EPSCO are LCA registered for the services detailed in the written agreement where applicable as per MSP001 - Quotations.

3.2 Management System to assess requirements and ensure appropriate programme of control measures is designed, implemented, monitored, and maintained.

EPSCO maintains an integrated management system that ensures all aspects of our legionella control activities are designed, implemented, monitored, and maintained to provide the highest standard of compliance and risk management. Our certified ISO9001:2015 quality management system is part of this and ensures we deliver the highest quality services to our customers. All our service MSPs (003, 030, 032, 033, 035 & 036) associated with the integrated management system have incorporated the LCA standards for service delivery.

Gathering information

EPSCO gathers information to allow a suitable and sufficient quotation to be built by asking questions of the client as per MSP001 quotations. Site surveys may be carried out if more information is required and site survey templates on Fastfield are utilised for this purpose. For Legionella Risk Assessments, any previous LRA or WCS is requested to aid this process.

Assessing requirements and designing control measures

EPSCO has an MSP for each of the services registered with the LCA with each MSP addressing the requirements for each client. Our unique chemistry and methods allow for several standard method statements and standard product selection that can be tailored to each sites requirements while ensuring quality and effectiveness are delivered every time. MSP014 – Method Statements manages this aspect.

Implementation

Each of our service MSPs cover the implementation of services. Our electronic scheduling software tracks site visits and allows for allocation of appropriate resources. Competent personnel can be selected by referencing the task competency matrix (F-TP84). Majority of work undertaken is Ad-Hoc and as a result is scheduled when needed and is not routine. Where routine work is scheduled, missed visits will be recorded as a non-conformance and investigated to resolution in line with MSP005 – Non-conformance and corrective action.

Monitoring and Maintaining

Delivery of services is monitored and maintained through our review section of our service MSPs. Onsite activities are monitored and maintained through site inspections carried out throughout the year. All paperwork is reviewed by management and any critical omissions or errors are highlighted and remediated prior to issue. A non-conformance is created if this occurs and is remediated in line with MSP005. A signed JORC is completed on every job as confirmation by the client that the work has been completed to a satisfactory standard.

3.3 Corrective, Preventative, and Improvement Actions

Corrective, preventative, and improvement actions are highlighted on the JORC (F-SF08) and in the completion reports following service delivery. The majority of work carried out is Ad-Hoc and as such subsequent visits to check on progress are not guaranteed. Where they are then these actions are tracked in the recommended actions section of the report and added to Client section of NC Register DC09 in line with MSP005. Where actions have not been taken to address legionella control risks, we have an escalation procedure (WI-78) that can be followed to ensure resolution. This is addressed in each of our service MSPs 003, 030, 032, 033, 035 and 036.

3.4 Calibration

MSP002 covers calibration of equipment. Our equipment maintenance plan and digital scheduling software allows for planning and completion of calibration tasks at appropriate intervals.

4. Communication & Management

4.1 Agreeing Contacts for Routine and Emergency Communications

All contacts for routine and emergency communication are agreed with clients at the quotation stage. The named person in the quotation is the person through which all communications will go unless otherwise stated as per all service quotation templates as per MSP001 - Quotations.

4.2 Non-conformance from Control Limits or Safe Operation

Our service MSPs 003, 030, 032, 033, 035 and 036 details the actions to take if a non-conformance from control limits or safe operations is observed. Any non-conformance would be communicated verbally to the client on site and detailed on the JORC (SF08) at the completion of the work. The non-conformance would then be detailed in the Completion Report for the works and recorded in DC09 – Clients NC & Actions register. This is detailed in MSP038 – Communication. Non-conformances from Legionella risk assessments have their own action register created for the site.

4.3 Other Significant Matters affecting the Control of Legionella.

Any significant matters specifically relating to the control of Legionellosis which EPSCO personnel become aware of that are outside of EPSCO's direct responsibility will be brought to the client's attention in line with MSP#003, steps 3.3. This will be administered using the (F-SF08) JORC on site immediately after the services are completed and using the Completion Report (F-SF37). Where issues are perceived to be critical to legionella control they will be raised immediately on-site to allow immediate isolation of the system and corrective action. In this situation these actions will also be detailed in a covering letter to the client accompanying the paperwork.

In the event of any necessary actions, the client's nominated personnel's contact details are recorded on the Site Report (F-SF01).

4.4 Staged Escalation Procedure

EPSCO has a legal and moral responsibility to ensure that any critical defects relating to the control of Legionellosis are communicated to the client and actioned in a timely manner in order minimize any risk to the lives of staff, contractors or members of public. The escalation procedure (WI-78) EPSCO will adopt should no action be taken is as follows:

Stage 1 – Initial Report to Responsible Person
EPSCO will raise the concern verbally when identified and via JORC (F-SF08). This will be followed up with Completion Report (F-SF37) and covering letter as outlined in step 4.3. EPSCO will make note on Site Report (F-SF01) that a critical defect has been raised and this must be enquired about when next scheduled service call is due to ensure it has been appropriately actioned.

Stage 2 – Escalation to Duty Holder If no action has been taken or planned within a reasonable timescale when communication reopens with client, EPSCO will issue a follow-up letter stating that if no action is taken then a formal escalation will be initiated via Critical Defect Escalation Letter (F-SF12). If it is necessary to escalate the matter, EPSCO will write to the Duty Holder, formally outline the concerns and seek a commitment to act. All dialogue and communications from this point will be recorded and stored in a file for reference should the matter escalate further.

Stage 3 – Report to the Regulator If after formal escalation of the issue and explanation in writing to client they continue to ignore the problem this process and EPSCO feels there is still a risk of serious personal injury or risk to health, we will report to the HSE by completing their concerns form using the following link:
https://services.hse.gov.uk/concernform/

5. Record Keeping

5.1 Identifying Records which should be maintained.

EPSCO maintains records of all works carried out over the past 7 years in line with MSP009. These include but are not limited to:-

- Contractual details and copies of documents submitted to the client.
- EPSCO Cleaning and/or Disinfection Certificate(s)
- Completion Reports – Observations/Defects/Recommendations.
- JORC On-site Job sheets
- Waste Transfer Notes
- Digital Images showing system condition, prior to and following cleaning routines.
- Record of Treatment, Monitoring & Discharge (F-SF21) (Where appropriate on work scope)

5.2 Records which should be kept by both parties, where and how.

Clients are informed to keep records for a minimum of 5 years as stated in the service quotation "important notes" section which is managed by MSP001. Clients should maintain all documentation related to the workscope for their records as detailed above. Where and how these records are stored by the client is left to their own document control procedures. EPSCO maintains our own records in line with MSP009 – Control of Records and Data.

5.3 Maintaining Own Records and making them available

All our own records are maintained in line with MSP009 – Control of Records and Data and states we will maintain all site documentation for a minimum of 7 years. These records are freely made available on request from the client.

6. Reviews

6.1 Formal review with client

Ad-Hoc Service Contracts: -
Registered services (MSPs 003, 030, 032, 033, 035 & 036) carried out on an individual basis will be reviewed following completion only, with aspects of system management and legionella control covered in the *Completion Report.*

Contracts for ongoing services: -
With contractual type legionella control works such as "routine & repeat" cleaning, disinfection (MSP003), inspection, monitoring, or sampling (MSP033), EPSCO will complete an annual Contract Review in line with each MSP. This includes examination of previous works, rates, frequency, systems conditions, system changes or additions. In addition, further dedicated system surveys and meetings may be initiated with individual sites as required to determine the plan moving forward. Together with clients, EPSCO documents all the requirements for the following year and re-submits a formal schedule of control services. Where possible this annual review will encompass a face-to-face meeting, but due to the nature of the contracts with large organisations, covering several smaller sites, most of the review will often take place via email and phone communication.

On approval of the annual schedule at the Contact Review appropriate changes will then be made to EPSCO Scheduled Programme of Works for the Client/Sites.

6.2 Assist with identifying training needs

Where a lack of knowledge or training is identified in personnel responsible for legionella control activities during the provision of services, this will be raised as a recommendation on site with the client contact and in the completion report in line with service MSPs (003, 030, 032, 033, 035 & 036). During a Legionella Risk Assessment, training is identified as a specific topic in the Management section of the report with appropriate recommendations made in line with MSP 030 – Provision of Hot & Cold Water System Legionella Risk Assessment Services.

7. Internal Auditing

7.1 Audit of management system for compliance with LCA code of conduct and service standards

Auditing will be carried out in line with the *Internal Audit Programme* as part of the overall integrated management in line with MSP#013 – Internal Audit details all the applicable steps and responsibilities required for internal audit of the systems and service provision within the company. The main processes are stated in section 1.2 and are audited as required in line with the level of works being carried out, but at a minimum on an annual basis.

In addition to these internal process audits, the company also carries out an annual compliance with the code of conduct audit and service delivery standards. This is carried out using the LCA internal audit templates. Where non-conformances are identified during the audit process, they are addressed using MSP005. A record of the audit is maintained for review in line with MSP009 control of records.

7.2 Audit of system outputs for effectiveness

The internal audit programme is designed to cover all aspects of the integrated management system. Process audits of services allow for auditing of service delivery from initial enquiry to completion in line with MSP013. Site inspections are carried out to audit the service being delivered and competence of individuals carrying out the task. All internal audits are recorded in line with MSP009 and made available to external auditors where requested.

7.3 Corrective Action programme

MSP005 covers non-conformances and corrective actions. This procedure enters any non-conformances and subsequent corrective actions into a spreadsheet tracker (DC09) where their progress can be tracked until resolved. It sets target timeframes depending on the severity of the finding. The spreadsheet is a live document and is regularly reviewed for progress.

7.4 Document Control System

MSP010 covers document control and ensures that all documents are updated in the relevant places and communicated to those who need to be aware. DC01 is the Master Document Register where document numbers and revisions are issued and controlled.

8. Sub-Contractors

The only subcontractor used by EPSCO is a suitable external UKAS accredited laboratory for water analysis. All sub-contractors are approved using MSP#022 - Vendor Approval and HSQ24 QHSE Supplier Approval Questionnaire.

9. Promoting Awareness of the LCA

EPSCO make available the current Code of Conduct and LCA registration Certificate to all clients on the company website https://epsco.co.uk/about-epsco/ under the Certificates and subscriptions heading. This is detailed in our Service Provision Quote templates in the Important Notes/Exceptions section in line with MSP001 – Quotations.

[END]