

Statement of Compliance - Legionella Control Association

Introduction

Contract Heating Ltd. is a gas, plumbing and electrical contractor involved in installation repair and maintenance work in domestic properties. We carry out work for private home owners, landlords, property management companies and central heating boiler manufacturers. In rented accommodation we carry out safety checks on gas, plumbing and electrical systems. On plumbing systems the safety checks consist of a risk assessment for legionella, this can lead to additional services including hot and cold water monitoring and inspection and cleaning and disinfection.

Within Contract Heating Ltd, the filing system used to store all documents related to clients is electronic and effectively paperless. Accordingly, all documentation created in the risk assessment process will be created and stored electronically.

The Health & Safety Executive's Approved Code of Practice (L8) addresses the issues that can be posed by the presence of legionella in water systems. In the associated guidance document, HSG 274 Part 2, in paragraph 2.138 it states that landlords who provide residential accommodation, as the person in control of the premises or responsible for the water systems in their premises, have a legal duty to ensure that the risk of exposure of tenants to legionella is properly assessed and controlled.

1 Allocation of Responsibilities

The client will contact Contract Heating Ltd. and through discussion the specific needs of the client will be identified and their obligations will be outlined and defined in conjunction with the current legislation and guidance, as outlined below:

- Health & Safety at work act 1974
- The control of substances hazardous to health 2002
- The management of Health & Safety at work Regulations 1998
- Health & Safety Executive ACOP L8 – Legionnaires disease, the control of legionella bacteria in water systems 2013
- Health & Safety Executive HSG 274 Part 2 2014

Discussions with the client will identify the required services. The services which can be provided by Contract Heating Ltd. are identified below. Any other required products and services relating to legionella associated risk reduction will be provided by the client and/or the client's nominated sub-contractor.

Risk Assessment (Method Statement CHL 001)

The systems which may constitute a risk will be identified and will be assessed using software provided on a tablet computer. The data is inputted on to a Legionella Risk Assessment Form to create a report in pdf format. This report is then sent by email to Contract Heating Ltd's office where it is checked and reviewed. Where they are contracted to supply these services, the records of the service will be provided to the client and they will then be responsible for the effective distribution of this information. Copies of the details will be stored electronically at the Contract Heating Ltd offices.

Hot & Cold water monitoring and inspection services (Method Statement CHL 002)

As a result of the findings of the risk assessment, recommendations may be made, if required, for processes and procedures that will assist in reducing the potential risk posed by the legionella organism and the assessed water system. These procedures may include flushing of little used outlets, recording of temperatures and inspection of cold water storage tanks amongst others. Contract Heating Ltd may be contracted to supply these services. Where they are contracted to supply these services, the records of the service will be provided to the client and they will then be responsible for the effective distribution of this information. Copies of the details will be stored electronically at the Contract Heating Ltd offices.

Cleaning and Disinfection Services (Method Statement CHL 003)

There may be a requirement to complete cleaning and disinfection processes on the individual sites. These services may include cleaning and disinfection of cold water storage tanks and associated down services, as well as shower heads in the properties. Contract Heating Ltd may be contracted to provide these services. Where they are contracted to supply these services, the records of the service will be provided to the client and they will then be responsible for the effective distribution of this information. Copies of the details will be stored electronically at the Contract Heating Ltd offices.



Cleaning and disinfection processes will be carried out in accordance with the method statements as follows:-

Cleaning and disinfection of cold water storage tanks and associated pipework and outlets – CHL 004

Clean and disinfection of showerheads – CHL 005

2 Training and competence of personnel

Staff involved in this work will have received relevant training. As a minimum they will have completed courses provided by NICEIC in Water Regulations and Legionnaires Disease. Senior staff have completed additional training supplied by an LCA recognised and accredited training supplier. This is considered to be sufficient given that the update training will be provided on an as required basis and every three years as a minimum. Training records, recording the attendance at the training courses, can be found in the individual's HR training file and are stored electronically.

Where it is assessed that clients require training then this recommendation will be made to the client and the training can be provided via a number of external training providers.

The work completed by the assessors has been reviewed using the Legionella Control Association Knowledge Matrix. The hot and cold water systems that will be assessed are considered to be "L" on the water system complexity measure and the Training/Skills/Knowledge required is considered to be level 1 or 2.

3 Control measures

Risk Assessments are completed on site and are sent to the Contract Heating Ltd office via email. The risk assessments are completed in line with the method statement – Completing Risk Assessments – CHL 001. The assessment is formatted to highlight areas of particular concern within the premises. The assessment is reviewed by a member of staff who has received training and guidance on the contents and implications of the findings of the assessment. The recommendations are checked for accuracy before the assessment is then emailed to the client and a copy is stored electronically in the client's file. On a regular basis a number of assessments are selected and sent to an external Legionella consultant for review and comment as to accuracy of recommendations and compliance with the HSE guidance.

Additionally, on a regular basis, a senior engineer or external consultant will attend site with a risk assessor, and review the risk assessing process. This will happen with each risk assessor at least once per year. A report of the visit will be completed by the senior engineer or external consultant and this will be stored in the assessor's HR training file.

4 Communication

Any documentation relating to the legionella risk reduction process is passed to the customer either by post or email. The time and date that the document is printed or sent is recorded in the company database. If there are any areas of concern which will require additional correspondence with the client, either by telephone or email, this would also be recorded within the company database and appropriate notes added to the client's electronic file.

5 Record Keeping

All records for Contract Heating clients are stored electronically on a shared server. This would include the completed risk assessment documents. The folder in which these documents are stored is backed up on an hourly basis and a copy is electronically taken off site on a daily basis. The client will be reminded to store the risk assessment document in the landlord, or property owner's file.

6 Reviews

The risk assessment work undertaken is of a "one off" nature and as such ongoing reviews are not carried out with the client. Should the client request a review of any of the findings of the work then the outcome of this review would be stored electronically in the client file. Clients are made aware of the need for ongoing reviews within the risk assessment document as detailed below

ON GOING CLIENT RECOMMENDATIONS

It is important to review the assessment periodically in case anything changes in the system. However, the frequency of inspection and maintenance will depend on the system and the risks it presents. In the event that ongoing monitoring and maintenance procedures are implemented, these should be recorded in a log book which should be reviewed on a regular basis."

Where Contract Heating Ltd is contracted to carry out the ongoing monitoring programme, then this will be reviewed on an annual basis with the client and the results of the review recorded electronically in the client's file.

7 Internal Auditing

An annual management meeting will be held to review the performance of the risk assessors in terms of the quality and accuracy of their work. It will also examine the level of compliance with the HSE L8 document and HSG 274 part 2 guidance. The meeting will also review internal company procedures to ensure that these are being adhered to. Any non conformances will be recorded and remedial actions put in place to address the non conformances. The details from this meeting will be recorded and filed in the Legionella file in the Contract Heating Ltd office.

Internal audits are completed to ensure that the process and procedure is acceptable and that the quality of the risk assessments meets the requirements as laid out in the L8 and HSG 274 Part 2 documents. On an annual basis a number of client files are accessed and the



order to risk assessment delivery process is checked. In addition a number of the risk assessments in these files are checked for technical quality and accuracy.

8 Sub-contractors

It is not anticipated that sub-contractors will be used in the delivery of these services.

9 Distribution of the Code

All risk assessments supplied to clients will have information on how to access copies of the Registration Certificate and Code of Conduct document via the Contract Heating Ltd. website.

