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FEEDWATER LTD	PROCEDURE REF:	SP037
STANDARD PROCEDURES	ISSUE NO:	008
STATEMENT OF COMPLIANCE WITH CODE OF CONDUCT FOR SERVICE PROVIDERS	DATE:	21/04/2010
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Scope of Activities

Feedwater Ltd provides a comprehensive range of services designed to control the risk associated with Legionella bacteria. These include the provision of water treatment chemicals, dosage and control equipment and onsite analytical and monitoring services for both cooling and domestic water. Onsite service is supported by laboratory analytical services for both chemical and microbial parameters using our own in-house UKAS accredited micro lab. Where appropriate customer training is provided using well developed training modules. Risk assessment is carried out using a format and process developed by Feedwater. The work is done using a mixture of in-house or self-employed personnel and LCA registered sub-contractors. The output of this process is reviewed by Feedwater prior to issuing to the customer. Cleaning and disinfection services are provided mostly using in-house personnel but in some instances by approved sub-contractors using jointly agreed methodology.

Whilst these activities are identified separately within this statement of scope they invariably either form part of an all-inclusive contract for water treatment services or an adjunct to such a contract.

1) Allocation of responsibilities

FEEDWATER draw up comprehensive service agreements with our clients for whom we are contracted to provide services associated with the control of legionellosis which:

- Formally advise our clients of their responsibilities as defined in the Approved Code of Practice (which gives practical advice on the requirements of the Health and Safety at Work etc Act 1974 and COSHH regulations concerning the risk from exposure to legionella bacteria).
- Define the water systems for which FEEDWATER contracts to provide certain services associated with compliance with ACOP
- Define the scope of the services which FEEDWATER contracts to provide associated with compliance
- Defines the additional duties and tasks that the company **does not** contract to undertake and for which the client must make his own arrangements for compliance.

Wherever possible the client is encouraged to sign and return the service agreement as his acceptance of it.

The introductory section requests a signed acknowledgement and:

- i) formally advises the customer that the service agreement is our understanding of the scope of works which we are contracted to supply
- ii) asks him to sign and return a copy
- iii) particularly draws his attention to Clause 3 as the means of defining his responsibilities under L8 and the extent to which we agree to carry out task on his behalf
- iv) notifies him formally that unless we receive written notification to the contrary it will be considered by us to represent the scope of the agreement we have with him

This service agreement document was revised in Feb 2008 and this change replaced the need for a contract intro letter or notice in lieu.

The procedure for this is detailed in SP036 Field Service – Service Agreements, Contract Intro Letter, “Notice in Lieu” and Agreement Quotations.

A further amendment was made in April 2010 to include reference to the Health and Safety at Work Act and associated regulations. SP035 sets out the processes by which potential customers progress from prospect to being an actual customer.

2) Training and Competence of Personnel

All regional staff receive training in the following areas which is supported by documented procedures:

- The ISO 9001 Quality Standard
- The control of contracts and management of a service schedule
- Water treatment chemistry and microbiology
- The principles of the treatment of boilers, cooling systems and closed recirculating systems
- Legionella awareness, Legislation and Regulation and the control of Legionellosis
- Microbiological sampling
- Disinfection Techniques
- Designing a water treatment programme
- Water treatment testing and selection
- The selection of control limits
- Corrective actions
- Carrying out a service visit, reporting results and record keeping
- Safe chemical handling
- Risk Assessment
- Conducting a review with clients
- Compliance with service provider commitments under the C of C

Laboratory staff receive specific training relating to their role which includes:

- Legionella awareness and Legislation and Regulations
- Microbiological sampling
- Microbiological analysis
- Record keeping and the interpretation and reporting of results
- Compliance with service provider commitments under the C of C

Each employee has their own specific training and competence record which is reviewed and updated in accordance with the procedures detailed in **SP181 (Training, Awareness and Competency of Sales and Chemical Service Staff)** and **SP180 (Training, Awareness and Competency of Non-Sales Staff)**. Staff are kept abreast of developments and best practice by periodic training meetings and company memoranda. It is the responsibility of the relevant line manager to ensure that competence is assessed and any training needs identified and met on an on going basis. Those involved in the provision of services directly associated with the control of legionellosis are subject to written knowledge and comprehension tests, as well as on- the-job assessment of their ability, as part of the process of validating their competence.

Sub-contractors providing risk assessment and cleaning and disinfection services are required to provide details of the training and assessed competence of their personnel which are retained as a matter of record.

The Client's training needs are considered as part of the annual joint review process. Where required Feedwater can provide tailored training to cover these.

3) Control Measures

The basis of the design, monitoring and maintenance of an appropriate programme of control measures is detailed in the following documents:

- Various sections of our ISO 9001 Quality Assurance procedures
 - **SP043 “Field Service - Product Selection for Chemical Treatment Programmes”**
 - **SP090 “Field Service - Service Visits and Service Reports ”**
 - **SP102 “Field Service - Test Procedures and Control Limits”**
- Our “Dosage Calculation Manual” (which gives further guidance on product selection)
- Our “Control of Legionellosis Log Book”
- Current versions of HSC’s Approved Code of Practice and HSE guidance documentation for the control of legionellosis

The procedures for corrective and preventive actions are part of our ISO 9001 quality assurance system and are detailed in **SP141 “Field Service – Corrective Action Following Analysis.”** This gives guidance on appropriate corrective actions where results fall outside the desired control limits. Serious or persistent non-conformity is subject to a Potential Risk Notification Report that is detailed in **SP090 “Field Service - Service Visits and Service Reports.”**

Verification that action has been implemented is typically done on the next service visit and is also addressed at the joint review meeting.

4) Communication and Management

In the event of the control programme deviating from the normal control limits the regional consultant will either make the necessary adjustments himself or advise the adjustments the client needs to make. Occasionally for circumstances beyond our control it may not be possible to bring the parameter within the normal control limits in which case the regional consultant will agree a concession with the client. All routine corrective actions or concessions will be detailed on the water treatment service report a copy of which is issued to the client. The procedures associated with this are detailed in our ISO 9001 quality assurance system (**SP090 “Field Service - Service Visits and Service Reports”** and **SP141 “Field Service – Corrective Action Following Analysis”**). With regard to the specific instance of positive legionella result this would be initially identified by one of our microbiologists who would immediately contact the relevant regional consultant (detailed in our laboratory General Analytical Methods). The regional consultant would then in turn contact the client's principle site contact (normally by phone) to discuss the appropriate corrective action. Where it is appropriate email may be used as a rapid means of communicating the requirement for action. These methods of communication are agreed with the client's principle site contact and in order to remove any perception of ambiguity all service agreements issued after Feb 2008 refer to these methods in clauses 2(a) and 2(c).

Advice on appropriate corrective action is detailed in **SP141 “Field Service – Corrective Action Following Analysis”**. In the case of a legionella positive the effectiveness of the corrective action would normally be confirmed by a retest.

As part of our ISO 9001 quality assurance system we maintain a comprehensive database of management information on each of our contract clients. This not only helps us to manage our contractual obligations but also details our client's principle site contact and other site contacts so we always have a record of who to contact should the need arise.

One of our obligations under the Recommended Code of Conduct for Service Providers is to bring to the attention of our clients any matters of evident concern of which we become aware and which may affect the control of legionellosis. If this is the case we will do so in writing on the water treatment service report and / or by separate Potential Risk Notification Report.

5) Record Keeping

As part of our ISO 9001 quality assurance system we maintain customer records at our Moreton headquarters for a relevant period these include:

- Correspondence
- All water treatment service reports
- Disinfection and cleaning reports
- Microbiological reports
- Our service agreement with the client
- A record of formal reviews

The procedure for maintaining these records is detailed in **SP160 “Control of Customer Related Records”**

All the above documents are issued to the client and he is advised to also keep them for a 5 year period.

Clients to whom we are contracted to provide services associated with the control of legionellosis are issued with a “Control of Legionellosis Log Book” for domestic water or evaporative cooling systems as appropriate. This provides recommendations on what tasks need to be carried out regularly and provides model report forms so that the appropriate record can be kept. Although in certain instances the Feedwater regional consultant may enter data in the log book it remains the client's responsibility to ensure that the log books or other site records are kept up to date.

In certain instances the client may wish to utilise computerised management and record keeping software which provides an acceptable alternative to the standard log book as a means keeping records. Alternatively the client may choose to produce their own record keeping system which better suits their specific organisational arrangements in which case they are advised to use the Feedwater log book as a model of the minimum records which should be kept.

6) Reviews

At least once a year the Feedwater regional consultant will conduct a formal review with each of his clients to whom we are contracted to provide services associated with the control of legionellosis.

This will consider the following areas:

- Whether the risk assessment is complete, adequately assesses the current situation (in the light of the latest codes of practice and guidance) and whether there are outstanding action points.
- The recent history of control / the effectiveness of the control measures
- The client's adherence to the recommendations given by Feedwater
- The availability and completeness of the site records
- Training needs of the client's staff
- The accuracy of the details on the Feedwater Client Quality Plan
- Opportunities for improvement
- Other areas of concern
- Agreed action points.

NB Whilst the risk assessment will be considered in the review this should not be confused with a formal risk assessment review which will be much more detailed.

The Feedwater regional consultant will produce a written report and a copy issued to the client. The procedure for carrying out a review is detailed in **SP173 "Field Service – Conducting a Control of Legionellosis Review Meeting"**

7) Internal Auditing

In conjunction with our quality assurance system a comprehensive audit is carried out to establish compliance with each of the service provider commitments and our related internal procedures. The data from this audit is analysed and where non-compliance is identified an assessment is made as to whether it is a systematic or an individual failure and appropriate action taken to correct the situation. The detailed procedure for this audit is given in **SP170B "Procedure for Auditing Chemical Servicing Function and Compliance with the Code of Conduct for Service Providers"**. A series of dedicated pro-formas are used to record the data and corrective actions.

8) Sub-contractors (as defined by the Code of Conduct)

If it is necessary for us to sub-contract work associated with the control of legionella it will normally be to an LCA registered company. **All sub-contractors are subject to an assessment process set out in SP061 with an accompanying prequalification questionnaire** prior to being approved which includes establishing whether they are LCA registered and receiving a copy of their LCA certificate. Where a sub-contractor is not LCA registered then they are encouraged to do so and their work is subject to a high level of supervision by Feedwater management.

Our use of sub-contractors is subject to annual audit which includes verifying their LCA registration status as detailed in SP170B.

9) Issuing of the Code to Clients

A copy of the current version of the Code of Conduct and our registration certificate is issued to all new clients to whom we are contracted to provide on-going services associated with the control of legionellosis and whenever we issue a new service agreement document. A copy of the Code and our registration certificate is incorporated in our log books which is issued to clients to assist them with record keeping.

In addition a copy of the Code of Conduct and our current certificate of registration are available as a pdf download from our website and there is a link to the LCA website. **Up to date copies of the LCA certificate are distributed to clients by field staff who visit the site.**