

		Fitz Scientific Fitz Scientific - Statement of Compliance Legionella Control Services	
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Scope of Business Activities

Fitz Scientific provide the following Legionella control services to a variety of customers in the public and private sectors in the UK and Ireland. Fitz Scientific carry out a range of environmental monitoring and testing services and are accredited to MCERTs for air emissions testing and ISO 17025 for a range of analytical testing.

Fitz Scientific provide sampling, testing and risk assessments associated with Legionella control services for customers on a periodic (i.e. monthly, quarterly etc.) or on a non-periodic basis (i.e. one-off type events).

Fitz Scientific offers the following services to its customers in the commercial, public and private sector:

Service Type		
Legionella Risk Assessment Services	Hot and Cold Water Services	01-01
	Evaporative Cooling Systems	01-02
Hot and Cold Water Monitoring and Inspection Services		03-01
Legionella Analytical Services	Sampling Services	07-01
	Laboratory Analysis (Sub-contracted)	07-02
	Interpretation of Analysis	07-03

1.0 Allocation of Responsibilities

- 1.1 Procedure ENV-2-004 Section 7 sets out the requirements relating to Legionella services quotations. This section sets out the requirements with regard to the client's responsibilities under the relevant legislation.
- 1.2 Procedure ENV-2-004 Section 7 sets out the requirements relating to Legionella services quotations. This section sets out the requirements with regard to the services provided by Fitz Scientific and those services provided by the client to meet current legislation.
- 1.3 Procedure ENV-2-004 Section 7 sets out the requirements relating to Legionella services quotations. This section sets out the requirements for formalised written agreement either by client's e-mail or signed purchase order.
- 1.4 Procedure ENV-2-004 Section 7 sets out the requirements relating to Legionella services quotations. This section sets out the requirements with regard to statements on LCA approved services provided by Fitz Scientific.

2.0 Training and Competence of Personnel

- 2.1 Training and competence requirements with regard to Legionella control services activities completed by our personnel are described in our Quality Manual Procedure ENV-2-0017 Personnel. All Technicians carrying out Legionella related work must undergo formal training.

In accordance with the Code of Conduct, Fitz Scientific complete in house training and external training through approved training organisations.

All technicians working on Legionella Control Services must complete the relevant formal in-house training on the following procedures:

- LC08 – Legionella Risk Assessment – Hot/Cold Systems
- LC12 - Legionella Risk Assessment – Evaporative Cooling Towers
- SOP EM249 – Sampling of Legionella in Water Systems
- Record Keeping ENV-2-0013 Control of Records
- FS SOP EM259 – Legionella control services - Hot & Cold Water Monitoring and Inspection Services

Technicians attend external training courses for formal Legionella qualifications. For internal SOPs, Technicians are supervised for a period of time and must complete 3 rounds of training on internal operating procedures before they are deemed competent. All Employees record their training and file training records. Please refer to Fitz Scientific Quality Manual Procedure ENV-2-0017.

- 2.2 Training needs are identified and plans are completed for relevant personnel as per Fitz Scientific Legionella Services Training Matrix document. Training plans are reviewed as and when training needs arise and at least on an annual basis. Please also refer to training record LC02.
- Competence of personnel is completed by continual assessment through supervision of work and reporting. For all personnel completing Legionella risk assessments competency, knowledge and experienced is assessed once per year using the competence assessment form LC09.

On site competence is also assessed once per year using the on-site competence assessment form LC10 - On Site Competence Assessment.

- 2.3 As part of our Legionella risk assessment procedure LC08 we will complete an assessment of the training records and competence of Client personnel. If we consider training to be inadequate we will make recommendations that further training is required and provide details of suitable training resources for the client.

3.0 Control Measures

- 3.1 Fitz Scientific has a management system in place to assess the Customer's legionellosis prevention/ control requirements and ensure an appropriate programme of control measures is designed, implemented, monitored and maintained. This will typically involve liaising with the customer (by means of a pre-contract form) carrying out a site survey/ reviewing a risk assessment/ written control scheme and identifying those service items which are essential for Legionella Control.
- 3.2 Any issues and recommended corrective actions raised as part of our Hot and Cold Water Monitoring and Inspection Services will be given a priority rating. It is the responsibility of the Customer to investigate or remedy these issue(s) raised. The implementation of Corrective and Preventative Actions are verified through our risk assessment service.
- 3.3 The verification of corrective and preventative actions is also carried out as part of the Hot & Cold water monitoring and inspection service. Compliance to the LCA standards is checked via an internal audit process (Section 7.0).

4.0 Communication and Management

- 4.1 Reporting procedures are detailed in Fitz Scientifics Quality Manual Procedure ENV-2-0025. Standard Operating Procedure EE448 outlines details for Customer Notification in the event of a positive Legionella result.
- 4.2 All Customer information is stored on our Database (reference procedure ENV-2-0004). Communication will be by e-mail or telephone as per contact details provided on pre-contract questionnaire. Where Fitz Scientific complete a risk assessment service, Hot & Cold water monitoring & inspection service and Legionella sampling, reporting and notification procedures will be carried out as per procedure LC07 – Notification Procedure. Where Fitz Scientific complete Legionella sampling, notification is completed as per procedure EE448.
- 4.3 Any items of concern not covered in the scope of works, as per the Quotation, will be identified and communicated to the Client as part of our Legionella Control Service. In the Legionella Risk Assessment process in the risk assessment document (LC08) as "Out of Scope" information in the risk assessment report and communicated by email if necessary.
- 4.4 Where there is a failure of the Responsible Person to act on or deal with identified deficiencies, a staged escalation procedure will be followed in accordance with procedure LC07 - Legionella Control Notification Procedure:
- Stage 1 – Initial Report to Responsible Person - Raise the concern in the normal way via the normal channels. Record in writing on the usual service documentation and seek a commitment to act.

Stage 2 – Escalation to Duty Holder - If no action is taken or planned within a reasonable timescale, repeat stage 1 and indicate that if no action is taken then a formal escalation will be initiated. If it is necessary to escalate the matter, write to the Duty Holder, formally outline the concerns and seek a commitment to act.

Stage 3 – Report to the Regulator - When all other communication processes with the client have been exhausted and you feel there is still a risk of serious personal injury or risk to health, report your concerns to the relevant enforcing authority (i.e. HSA/ HSE/ EHO). You can request anonymity which they are then obliged to maintain. Where a situation exist with a client who won't take action, Fitz Scientific may also seek legal advice.

5.0 Record Keeping

5.1 Procedure ENV-2-0004 requires a quotation to be sent to the client. Record keeping requirements are included in the quotation, for both parties, and also the Risk Assessment Report (in-line with paragraph 72 of ACOP L8).

Fitz Scientific are responsible for maintaining our own records (records that are produced by Fitz Scientific).

The client is responsible for maintaining all records associated with their water system.

5.2 The client will be responsible for all records relating to the Control of Legionella. This is made clear in all quotations, with records to be retained in accordance with HSE UK ACOP L8 (paragraph 72).

6.0 Reviews

6.1 Procedure ENV-2-0004 sets out the requirements relating to Legionella services, where a contract has been agreed for a period of 12 months or more, will include the provision for a formal contract review to occur between Fitz Scientific (service provider) and the Customer. This review will cover areas relevant to the service provided by Fitz Scientific and review customer requirements.

By default, no formal reviews will take place between the Fitz Scientific (service provider) and the Customer (service user) for Legionella control services that has been defined in the contract as a one-off type event or a contract duration of less than 12 months, unless otherwise specified by the customer.

7.0 Internal Auditing

7.1 As part of the compliance with the Code of Conduct, Fitz Scientific perform an internal self-audit on the Legionella services we offer. This is carried out by the Quality Manager on an annual basis, as part of the Quality Management System in accordance with Quality Manual procedure ENV-2-0014 Internal Auditing. Internal Audits are carried out on Internal Audit Form – Legionella Control LC11. Auditee's are required to sign the completed audit form to agree any findings in the audit.

7.2 Any non-conformances raised will be addressed using the Corrective Action Procedure (ENV-2-0011) and Improvement Procedure (ENV-2-0010) to ensure compliance with the Legionella Control Association's nine service provider commitments. Hardcopies of records of Internal Audits are filed in a Folder (Internal Audits) held by the Quality Manager and scanned soft copies are saved on the Quality Management Drive (\\FSDCW2K12\quality\7. Internal Audits) on the Fitz Scientific internal server. Secure access to the Quality Management Drive is restricted to limited users, including the Quality Manager and the Company Director.

8.0 Subcontracting Work

- 8.1 Fitz Scientific have a Management Procedure in place, detailed in Quality Manual Procedure ENV-2-0005 Subcontracting of Tests and Calibrations, which ensures that any subcontractor used holds an independent accreditation and LCA registration. Under the Scope of this Statement of Compliance, Fitz Scientific subcontract Legionella analysis services to an external UKAS accredited laboratory with LCA registration.
- 8.2 Not applicable.
- 8.3 Annual in-house subcontractor reviews are carried out as part of Fitz Scientific's Quality Management system. UKAS accreditation status of the Sub-contracting analysis Laboratories used are checked and verified every 6 months by checking the UKAS website for current Accredited Laboratories. Analysis certificates will also be checked for the inclusion of the UKAS logo, further verifying the accreditation status of the sub-contracting laboratory. LCA registration status of the sub-contracting laboratory used for legionella analysis will be checked and verified every 6 months by checking the LCA website for Registered Suppliers of Legionella Analytical Services and by reviewing the sub-contracting laboratory/s website.

9.0 Distribution of Code

- 9.1 Every quotation will include details of where the LCA Code of Conduct, and our Certificate of Registration, will be made available. Copies of our current Certificate of Registration and LCA Code of Conduct will also be available on our website: <https://fitzsci.ie/water/legionella-risk-assessment/>

Revision History			
No.:	Nature of Change	Date Ratified:	Ratified By:
Rev 1	Request from LCA to number subsections as per prep document	18 Feb 2019	A Khan
Rev 2	Internal review and assessment based on LCA review	28/03/2019	A Khan
Rev 3	Inclusion of legislation references	16/04/2019	A Khan
Rev 4	Inclusion of Notification Procedure LC07 in Section 4.4	08/05/2019	A Khan
Rev 5	Sections corrected and summarised, based on LCA review 16-17/05/2019.	17/05/2019	A Khan
Rev 6	Updated font and company logo. Added information to Sections 3.0 & 6.0.	01/07/2020	Adrian Gaughan