

		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. Allocation of Responsibilities

- 1.1 Fitz Scientific holds LCA registration for the following service categories: Legionella Risk Assessment Services (Hot and Cold Water Services and Evaporative Cooling Systems), Hot and Cold Water Monitoring and Inspection Services, and Legionella Analytical Services (Sampling Services, Laboratory Analysis - Subcontracted and Interpretation of Analysis). 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 and what is required by the Client to comply with the Law in respect of Legionella control and is further outlined in the Sales Quotations.
- 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. This section also sets out the requirements for formalised written agreement either by client's e-mail or signed purchase order.

2. 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. Training needs are identified and plans completed for relevant personnel as per Fitz Scientific Legionella Services Training Matrix document LC01.

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.

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- 2.2 Training plans are reviewed as and when training needs arise and at least on an annual basis. Please also refer to in-house training record LC02 for internal SOP training. Competence of personnel is completed by 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 on-site competence assessment form LC10. Form LC14 is used to determine competence assessment validity and whether further training is required by the Technician.
- 2.3 Procedure ENV-2-0017 (Personnel) outlines how training and competence records are recorded and retained on the individual Technicians training files (both in electronic and hard copy format). Form LC02 is used to record training for internal SOPs. LC01 (Training Matrix) is updated as and when Technicians are deemed competent to carry out procedures associated with internal SOPs and upon successful completion of external training courses.
- 2.4 Staff are updated on new developments/best practice via meetings, internal memos and e-mails. Fitz Scientific will ensure Technicians remain current Water Management Society members. Additional awareness is raised through the supply of publications such as Waterline along with other trade publications.

3. Control Measures

- 3.1 All the Legionella control services which are offered by Fitz Scientific (as listed in 1.1) are registered with the LCA and are stated within the written agreement (Quotations) with the Client as per the requirement of procedure ENV-2-0004 Section 7.
- 3.2 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. Procedure ENV-2-004 Section 7 sets out the requirements relating to Legionella services quotations. To verify/check that required tasks/checks are being completed as part of control measures by Customers, Fitz Scientific will carry out QA checks on incoming work records supplied by Customers (e.g. status of actions completed from monitoring visit records; checking if correct control limits have been applied and checking if test results have been interpreted correctly). Field Motion software and a suitable proportion of job records can be used to assist in carrying out the assessment.
- 3.3 Procedure ENV-2-0004 Section 7 outlines that where a Legionella control service contract is in force for a period of 12 months or more (i.e. a recurring service and not a one-off service), then during the contract review process any and all recommended corrective, preventative and improvement actions will be checked to ensure that they have been carried out to completion and are effective. For on-going contract works, an Excel based spreadsheet - Risk and Remedial Measures Register (Form LC015) – will be used to track corrective, preventative and improvement actions. This will be reviewed annually as part of the annual contract reviews as described in Section 6.1. 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 also verified through our risk assessment service. Legionella risk assessments use a third-party software supplier (TEAMS Legionella). 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).
- 3.4 As per Fitz Scientific Quality Manual Procedure ENV-2-0020 (Equipment), all Field thermometers/thermocouples are assigned a unique equipment identification number (EM numbers). A register of equipment is held on the Fitz Scientific "QRSys" Access Database. This database keeps a record of equipment calibration dates/details and also notifies/reminds relevant staff by email of upcoming re-calibration due dates. The register also indicates which staff members are assigned the Thermometers. When Thermometers are withdrawn from service due to damage or unable to repair, then these are marked as such on the QRSys. All Field thermometers are sent for either annual traceable or accredited calibration.

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4. Communication and Management

- 4.1 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. 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 Where Fitz Scientific become aware of a client's control measures falling short of regulatory and best practice requirements which may lead to an increase in the likelihood of Legionella risk, then Fitz Scientific will at the earliest opportunity notify the client of these defects by telephone and email follow-up. A completed Defects Register (Form LC016) will be sent to the Client. 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. 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.

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- 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).
- 5.3 Fitz Scientific have established a record retention period of 7 years for all our own records. This is outlined in our Quality Manual Procedure ENV-2-0013 (Control of records). In addition, the use of a third-party software (TEAMS Legionella) to carry out risk assessments allows all records to be kept on the third-party supplier's servers for future retrieval.

6. 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. Where legionella control services are provided on an ongoing basis to the Customer (i.e. not one-off service), then the service provision shall be reviewed annually with the Customer and recorded on form LC04.
- 6.2 Fitz Scientific do not offer training to Clients. However, Fitz Scientific will assist the client to assess and identify training needs of their staff and assist in directing them to appropriate sources of training. Where legionella control services are provided on an on-going basis to the Customer (i.e. not one-off service), then the Customers staff training needs shall be documented in form LC04 during annual reviews.

7. 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 A representative proportion of contracts, job types or clients to be audited annually will be selected from our records.
- 7.3 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.

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8. 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. No other subcontractor services are employed by Fitz Scientific for the other service categories for which we are registered.
- 8.2 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.
- 8.3 Not applicable.
- 8.4 Sub-contractor work/output will be audited as part of internal audit (Section 7.0).

9. 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
Rev 7	Updated Section 2.2 to reference LC01 training matrix; Added Section 2.4 (identification and dissemination of industry standards and good practice to Staff); Updated Section 3.2 to include use of third-party software for carrying out risk assessments; Added Section 3.4 for calibration/validation procedure for field test equipment; Added Section 5.3 – details of maintaining our own records; Added Section 6.2 – information on assessing and advising on Client training needs; Added Section 7.2 on auditing a representative number of contracts, job types or clients in the annual internal audit ; Updated Section 8.1 to confirm that no other sub-contracting services (other than Legionella analytical services) are used by Fitz Scientific; Added Section 8.4 – inclusion of sub-contractor work/output in the annual internal audit.	04/04/2022	A Khan
Rev 8	Sections corrected and summarised, based on Corrective Actions in LCA Audit review on 09/05/2022.	17/06/2022	A Khan