	Ref:	LCA-SOC
LCA WATER HYGIENE MANAGEMENT MANUAL Statement of Compliance	9 th Issue Date: -	25/01/2019
Issued by: SD	Authorised by: CB	

Statement of Compliance

A recommended code of conduct for service providers

Carter Environmental Engineers Ltd (CEE) specialise in the Design, manufacture, assembly, installation of liquid cooling systems and supply of water treatment services, chemicals and equipment to all services.

With regard to the LCA our scope of services is:-

- Cleaning and Disinfection Services.
- Plant and Equipment Services (Installation, refurbishment, servicing, design and supply).

Our objective is to ensure we provide these products and services in accordance with contractual and regulatory requirements.


This policy statement has been produced to meet the requirements for membership of the “Legionella Control Association - Code of Conduct for Service Providers”. The Health & Safety Commission's Approved Code of Practice, L8 - Legionnaires Disease - The control of legionella bacteria in water systems, detailing the benefits of using registered companies in paragraph 57, ACOP HSG 274 part 1. The control of legionella bacteria in evaporative cooling systems.

1. Allocation of Responsibilities

In accordance with LCA Service Provider Commitment 1, we explain in detail the client's obligations under the relevant legionellosis legislation specifically;

- Health and Safety at Work etc Act 1974
- Control of Substances Hazardous to Health Regulations (& Amendments)
- HSC ACoP L8 - Legionnaires' disease - The control of legionella bacteria in water systems).
- The notification of Cooling Towers and Evaporative Condensers Regulations 1992.

- 1.1. The procedure for setting up a new client (CEE-LCA-1.1 Allocation Of Responsibilities) drives the issue of: -
 - 1.1.1. The HSE leaflet IACL27, which is supplied to new potential clients, details the client's obligations including the requirement to: -
 - 1.1..1. Identify and assess the sources of risk
 - 1.1..2. Prepare a written scheme of control
 - 1.1..3. Appoint a responsible person
 - 1.1..4. Implement, manage and maintain records of monitoring and inspection.
 - 1.1.2. A copy of our current LCA certificate and code of conduct is held on the company website, each quote details where the certificate and code of conduct are located, and a copy is also sent out attached to each relevant quotation. The quotation will indicate LCA registration for the service category being provided.
This is checked and noted during our annual audit procedure (CEE-LCA P7.1).
Every customer account will be made aware of the contents and aim of the Code of Conduct and the meaning of all documents.

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- 1.2. CEE often operates as a sub-contractor working for a primary service provider, who would be responsible for defining the allocation of legionella control tasks. Where CEE provide services directly, quotation template (JP1) clearly indicates those items that are included in our supply and with the use of a standard paragraph inform potential client's of a number of additional responsibilities that will remain with them.
- 1.3. All orders have a formal quotation document (JP1). Acceptance of a quotation is evidenced by issue of an official client order (ideally confirming our quotation reference. This this may be received in the form of a written signed agreement, e-mail, facsimile or order number which is then recorded on the Sage computer system, this is part of procedure CEE-LCA-1.1.

2. Training and Competence

In accordance with LCA Service Provider Commitment 2, all CEE personnel receive or have received formal training associated with the control of legionella bacteria.


- 2.1. Our training procedure CEE-LCA-P2.1 details the company procedure for producing a training program and recording each employee's current status on a matrix. The matrix is based on the LCA training matrix and details the relevant training required by each employee, depending on which of the above services they conduct on behalf of CEE (Form CEE-LCA-2.1). Training certificates are held according to ISO 9001 Quality manual 6.1 provision of resources.
- 2.2. CEE operates a formal 'shadowing' system for assessing employee competence. Procedure CEE-LCA-P2.1 details the requirement for a manager to assess each employee's ability to follow service procedures (CEE-Method statements) using simple pro forma assessment sheets based on each of the service procedures. Audits will be carried out as a minimum annually on site during normal working processes to ensure the correct competence level is maintained in accordance with the CEE requirements and the LCA Standards for Service Delivery In the case of any changes to guidance or legislation training will be provided.
- 2.3. In order to ensure that CEE remains in touch with developments and current affairs we are active members of the Water Management Society. Waterline along with other trade publications are circulated within the organisation and discussed at management meetings as required.

3. Control Measures

In accordance with LCA Service Provider Commitment 3, CEE operates a written procedure for the control of service (CEE-LCA-P3.1).

All refurbishment and water treatment services will be dictated by the actions from a specific Legionella Risk Assessment.

- 3.1. Program Design (CEE-LCA-3.1 Control) is integrated with our ISO 9001 quality system and requires the production of a Water enquiry form and costing information which is slightly different for each service: -
 - 3.1.1. New Build should follow flow charts
 - 3.1.1.1. New equipment Quotation QP 90
 - 3.1.1.2. Order processing QP 95
 - 3.1.1.3. Purchasing QP30
 - 3.1.2. Refurbishment
 - 3.1.2.1. For CEE Ltd products - Use product identification to define the tower (AQ reference) and go to technical data files and obtain parts. Build material costs and project costs.


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- 3.1.2.2. Competitor products - Collection of site details via call or site visits, establish scope of works, completion of survey details and estimate sheet, obtain reference information from any source possible.
- 3.1.3.3 Training is provided and upgraded when necessary in the formulation of suitable treatment regimes, a treatment design sheet is completed at the quotation stage, which should be verified by a senior appointed person.
- 3.1.3.4 Application rates for chemicals are dictated by independent standards and chemical blender/suppliers and listed in section 3 of the company servicing standards.
- 3.2. Program Set up
 - 3.2.1.1. On receipt of an official order from a client (Email instruction, order number, signed service agreement etc.); the relevant quotation is used to create a contract number, checked by contracts manager for terms and conditions and issue an order acknowledgement. A contract file will then be initiated.
- 3.3. Job Scheduling
 - 3.3.1.1. The programme of works must then be allocated to the service and refurbishment manager or the new build production plan as appropriate.
 - 3.3.1.2. Once programming has been arranged with the client and dates have been agreed formulate safety risk assessments, site specific method statements as required. .
- 3.4. Conduct site visit and carry out tasks in line with a site specific risk assessment and method statement.
- 3.5. All paperwork generated from the job i.e. certificates; work sheets must be inserted into the relevant contract folder at head office and site log book.
- 3.6. The performance of each contract is monitored by the line manager checking all incoming job completion certificates and reports for completeness and further actions required.
- 3.7. In the event of a nonconforming result, action is taken in accordance with the company QMS...
- 3.8. Any non-conformity / corrective actions are identified on job reports at the time of our visit. Any corrective actions will be followed up by the line manager to ensure compliance. However only the client can authorise corrective actions, Non-conformances are recorded and logged on by the QHSE manager where a register is maintained for corrective actions.

4. Communication and Management

In accordance with LCA Service Provider Commitment 4, Full details of our communication procedure can be found in CEE-LCA-4.1 Communication.

- 4.1. A strict communication structure is operated between the company and customers to ensure that all relevant responsible persons are informed of the current status of the contract. Formal lines of communication are determined at the start of the contract and held in the contract file.
- 4.2. On obtaining a new contract, a review is carried out to ensure full compliance with the company requirements.
- 4.4. A formal staged escalation procedure is in place to ensure that in the event of significant matters of concern that must be raised, they will be escalated as necessary, to the responsible person, the duty holder, and as a last resort, to the relevant enforcement agency.

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4.5. Should any additional Legionella related matters arise outside the scope of the contract these will be relayed to the responsible person on site using the agreed communication channels.

4.6. In the event of a nonconformity not being resolved then the relevant site personnel will be contacted to discuss the issues raised and proposed corrective actions.

4.7. All nonconformities will be maintained on the QMS system where a register will be maintained for action by the contract managers.

5. Record Keeping

In accordance with LCA Service Provider Commitment 5, CEE maintains records as follows: -

- 5.1. Internal CEE Ltd documents are kept as defined by our quality procedures Control of Documents QP-2 & Control of Records QP-3.
- 5.2. All results, communications and correspondence are copied to the office contract files and service monitoring system, these particulars are kept in the file until archived in accordance with the company QMS.
- 5.3. Each service engineer maintains their own working file with current results and communications in accordance with the standard company format.

6. Reviews


In accordance with LCA Service Provider Commitment 6, a program is established with all of our clients to formally review of all aspects of the agreement currently in place.

6.1. If the contract is for a one off order then a review of the contract will not take place.

7. Internal Auditing

In accordance with LCA Service Provider Commitment 7, we implement internal auditing systems (CEE-LCA-P7.1) at least once per year.

- 7.1. Procedure CEE-LCA-P7.1 measures the degree as to which our company has complied with the 9 commitments and that any corrective actions required are addressed.
- 7.2. All internal audits are conducted by an external individual who is independent of the service delivery process being assessed. In accordance with recognised auditing best practice individuals do not audit their own areas of work. The audit is reported on form CEE-LCA-F7.2 and supplied to the contract manager for discussion and action.
- 7.3. Procedure CEE-LCA-P7.1 calls for the use of forms (CEE-LCA-F7.2) to formally record any found non-conformities. The final section is used to set agreed dates for corrective action to be completed and records the date of completion.

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8. Sub – Contactors

- 8.1. Where sub-contract labour is used it will be LCA registered whenever work is carried out which is Legionella specific, only companies on the approved list will be used.
- 8.2. All sub-contractors have to comply with the company vendor policy which indicates the completion of a statement detailing the companies insurance, QA, health and safety and training/experience, this will be assessed and approved by the line manager.
- 8.4. Sub-contract works will be inspected on a random basis by the relevant line manager to ensure full compliance with the specification, ACOP L8 and the code of conduct. Any rectification work will be carried out in a timely manner.
- 8.5. Sub – contractors will work to CEE’s agreed safe methods of working and will be monitored by CEE.

9. Distribution of the Code

In accordance with Service Provider Commitment 9,

- 9.1. A copy of our current certificate and code of conduct is held on the company website, each quote details where the certificate and code of conduct are located. This is checked and noted during our annual audit procedure (CEE-LCA-P7.1).
- 9.2. Every customer account will be made aware of the contents and aim of the Code of Conduct.