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CONTROL OF LEGIONELLA STATEMENT OF COMPLIANCE

This document is produced as part of the requirements for "Legionella Control Association" membership.

Membership of the LCA is detailed in the HSE ACoP L8 – Legionnaires disease – the control of legionella bacteria in water systems (HSG274 Part 2 The Control of Legionella Bacteria in Hot & Cold Water Systems, published 2014 and HSG274 Part 3 The Control of Legionella Bacteria in Other Risks Systems, published 2013) (Part 1 The Control of Legionella bacteria in Evaporative Cooling Systems – currently not part of our remit)

OCO Limited are active contractors within the water hygiene sector and currently run various measured term and upgrade contracts for local authorities.

OCO Limited scope of works include:

- 01** Risk Assessments – which we subcontract out to a specialist company
- 03** Hot & Cold Water Monitoring
- 04** Cleaning and Disinfection
- 07** Legionella Sampling & Interpretation of analysis
- 08** Plant & Equipment Services

The objective of our works is to provide these products and services in accordance with contractual and regulatory requirements, using trained and experienced operators.

1. Allocation of responsibilities

In accordance with our procedures and service provider commitment 1 we explain in detail the clients' obligations under the current legionellosis legislation: -

- Health and Safety at Work etc Act 1974
- Control of Substances Hazardous to Health Regulations (2002)
- HSE ACoP L8 - Legionnaires' disease - The control of legionella bacteria in water systems).
- Management of Health & Safety at Work Regulations.

1.1. The procedure for providing guidance to the service user (client) on what they are required to undertake to comply with their legal obligations in respect to Legionella Control(OCO LCA-1.1 Allocation of Responsibilities) drives the issue of an advice note OCO-LCA-1.2 Obligations.

This advice note details the requirement to:

- Identify and assess the sources of risk
- Prepare a written scheme of control
- Appoint a responsible person
- Implement, manage and maintain records of monitoring and inspection

1.2. in order to ensure our clients are aware of the services provided by us and those that should be provided by the service user (client or others), form OCO LCA- 1.2 incorporates a itemised summary of all of the tasks required by L8 indicating those that are included in our supply and those that remain the client's responsibility.

Works for our clients are acquired through government tendering and procurement methods. Under European Directives local authorities need to ensure works for a substantial value (over £10k) are competitively offered and tendered to a wide range of companies proven able to carry out such works. The directive stipulates the set of criteria and time scales that must be followed in tendering and awarding such works. The client will determine the works required in the form of a specification, which the contractors will price against. Works of the size and nature are not normally just awarded on price alone but on the basis of proof and commitment the nonfinancial criteria i.e. resources, quality control procedures, management of health and safety etc. The contract is deemed to comprise of the tender submission together with issuing of an order.

We confirm to the customer we have LCA membership for the service categories stipulated within form OCO LCA 1.2.

2. Training and competence

In accordance with LCA service provider commitment 2, all water treatment operatives receive training associated with the control of legionella bacteria.

Our training procedure OCO-LCA-2.0 Training and Competence, details the company procedures for producing a training program and recording each employee's current status on a matrix based on the LCA training guide. (OCO LCA-2.1 (A) Training Matrix)

- 2.1. OCO Limited operate a formal shadowing system for assessing employee competence. Water Treatment quality control including tank inspections, sampling & temperature monitoring in form (OCO LCA-2.2. Revised November 2016)
- 2.2. Procedure OCO-LCA-2.0 details the requirement of an onsite supervisor to assess each employee's ability to follow Method Statements (OCO-MS01 to MS17) using simple pro forma assessment sheets based on the service procedures.
- 2.3. Records of operatives training are logged, and future requirements addressed within the training matrix (OCO LCA-2.1 (A)). Ongoing competency checks are undertaken periodically via assessment by onsite supervisors logged on form (OCO LCA -2.2)
- 2.4. Audits are conducted annually both externally via LCA accredited auditor and internally. These highlight any failure to introduce continued developments within the sector. Ongoing competency checks are recorded to assess operatives are working to best practice (OCO LCA-2.2)

3. Control Measures

In accordance with LCA service provider commitment 3, OCO Limited operate a written procedure for the control of service (OCO LCA-3.1 Control Measures)

Since we do not have any responsibility or contracts for cooling systems, control measures with OCO Limited are restricted to hot and cold water systems including the collection of samples (microbiological) for assessment and remedial action.

- 3.1. All areas of interest are declared to the LCA on annual basis at reregistration stage.
- 3.2. Written method statements (OCO-MS01 to MS17) are provided for each work operation together with specific client service proposals as appropriate. These include water tank surveys, water system inspections, cleaning, disinfecting and microbiological sampling.
Confirming OCO's services meet the LCA's service standards. This is measured via the use of service specific checklists during the internal audit process
- 3.3. The performance of each treatment regime is continually monitored by the Water Treatment Manager, who assesses the service reports and laboratory analysis reports for any required actions. OCO LCA-3.1 (Control Measures) details the process of putting all non conformances into client specific spreadsheets. The progress of each required corrective action is then discussed at monthly progress meetings with our service users (clients).

3.4 Minimal equipment that requires calibration used inhouse (thermometers). OCO currently opt to replace these on an annual basis rather than calibrate.

4. Communication and Management

In accordance with LCA Service Provider Commitment 4. OCO Limited operate a written procedure for communication (OCO-LCA-4.1 Communication)

- 4.1. All contacts , roles and numbers are detailed within OCO -LCA 4.1.
- 4.2. Each site has a documented management structure, programmed visit records and defined control limits agreed with the service user (client) all held on our Contract Management system, and locally on spreadsheets by the Water Treatment Manager Details of non-compliances are initially highlighted in writing on our service reports. If possible our engineers will carry out any remedial actions required to correct the non-compliance at the time of the service visit. Details of these corrective actions are itemised on our service reports, a copy of all service reports are sent to our client's defined representative for incorporation into their record system.
- 4.3. If positive legionella or high general microbiological results are identified by our external laboratory, they are communicated initially verbally to the designated contact or deputy. Following verbal contact conditions are e-mailed to the client. OCO Limited have a commitment to use the standard company communication procedures for matters of concern affecting the control of legionellosis that come to our attention but that are outside of our current commitments.
- 4.4. OCO have a staged escalation procedure as outlined within OCO LCA-3.1 Control. Where necessary guidance is provided to the service user (client) and where applicable OCO will issue an escalation letter OCO LCA-3.1 (A) which clearly outlines current risks and required controls . When all other communication processes listed above with the service user (client)have been exhausted and we feel there is still a risk of serious personal injury or risk to health, we will have no option but to report our concerns to the relevant enforcing authority (i.e. HSE/EHO). We may also seek legal advice should we find ourselves at this stage.

5. Record Keeping

In accordance with LCA service provider commitment 5 OCO maintain records (Procedure OCO-LCA-5.1 Record keeping) only of works undertaken by our engineers. The contracts we maintain are not inclusive of the provision of a legionella record system as required by ACOP L8.

- 5.1. Identified records as listed in OCO LCA-5.1 will be maintained to provide evidence of legionella control.
- 5.2. Identified records as listed in OCO LCA-5.1 will be maintained and kept with either the service user (client) or OCO as agreed.

- 5.3. Job files are maintained by OCO Limited at our Bromley office. All service reports, correspondence, microbiological analysis reports, disinfection certificates and descaling certificates are maintained and will be held for at least 5 years.

6. Reviews

In accordance with LCA service Provider commitment 6, OCO limited operate a written procedure (LCA-6.1 Reviews).

- 6.1. A program is established with all our clients to formally review all aspects of the agreement currently in place. Review meetings are held at least annually but in many cases more often due to the size of each agreement, which will normally include works outside the scope of the LCA code of practice. In these instances water hygiene will form only a part of the total performance review on the meeting agenda.
- 6.2. These meetings will include an opportunity to advise the client on training needs of their staff and how they may achieve them.

7. Internal Auditing

In accordance with LCA service provider commitment 7, OCO will implement internal auditing systems (OCO LCA-7.1 Internal Auditing Procedure). These procedures ensure the degree with which our company has complied with the above commitments and are assessed and any corrective action required is addressed.

- 7.1 Audit carried out either by the Strategic Manager or the Health,Safety, Environmental & Quality Advisors annually using form LCA-New-CA-Audit-Form together with service specific checklists: No: 1 Risk Assessment Service,3 Hot & Cold Water Monitoring & Inspection Services. No: 4 Cleaning & Disinfection Services. No: 7 Legionella Analytical Services. No: 8 Plant & Equipment Services.
- 7.2 Audit of all aspects of management system and service delivery to ensure effectiveness . these to include samples of training records, competency and sub contractual monitoring forms. Records to be kept on file . OCO submit copies of our internal audit with supporting checklists and documentation to the LCA on reregistration.
- 7.3 The procedure calls for the use of corrective action forms OCO LCA- 7.2 to formally record any found non-conformities and agree: Corrective action required, Responsible person, Timescale and Date of Completion in accordance with LCA Service Provider Commitment 7.
- 7.4 As per our ISO 9001 accreditation we carry out document control to ensure corrected and updated version of each document are being used and archive old documents for a period of 5 years.

8. Sub Contractors

In accordance with LCA service provider OCO Limited operate a written procedure (OCO-LCA-2.0) to enable control of Sub-Contractors.

- 8.1. Currently the laboratory sub-contractor engaged by OCO Ltd in LCA accredited activities is our UKAS accredited Laboratories Eurofins and ADEY. In addition LCA sub-contractors are used for legionella risk

assessment. Their LCA status is confirmed by the use of OCO-LCA-8.0. This is checked periodically.

- 8.2. Sub contractors questionnaires are used to confirm current LCA registration status and these also form the competency assessments conducted on subcontracted staff periodically throughout the year (Form OCO-LCA-8.0)

8.3. Non LCA registered companies are permitted to work on behalf of OCO Limited on water treatment / Legionella control activities as long as they have satisfied our competency checks as outlined in OCO-LCA-2.0. A completed LCA Competence Assessment Validity Form 204.19 07-21 will be required for each non LCA registered subcontractor.

8.4. Any tasks that are non legionella /water treatment specific completed by staff outside of OCO limited that do not have LCA registration work under the direction of our policies and procedures and their work is subject to internally auditing as per commitment 7 of the code of conduct.

9. Distribution of the code

9.1. Annually a copy of the LCA code and our registration certificate are sent to each client with the "specific allocation of responsibilities" documents OCO-LCA-1.2. – *(Note: At present time liaising with Clients regarding Part 2 item 2.10 – 2.28 smaller hot & cold water systems with regard to management of these type of systems)*

9.2. The allocation of the LCA code is checked and noted during our annual audit procedure OCO-LCA-7.1.

9.3. A link to the OCO Ltd SOC, OCO-LCA-1-1-Duty Holder Responsibilities & OCO-LCA-1-2-Obligations are also ever present on the OCO Ltd Company website.