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THE CONTROL OF LEGIONELLOSIS

A Recommended Code of Conduct for Service Providers

TSS Facilities Limited is an ISO9001 quality assured company; The Water Treatment department is a Category 1 member of Legionella Control Association. The business activities covered by our Legionella Control Association Category 1 certificate are:-

- L8 Legionella Risk Assessment
 - Chemical water treatment services, including chemicals, dosing and control systems, on site analytical and monitoring services.
 - Hot and cold water monitoring and inspection services.
 - Cleaning and disinfecting including refurbishment.
 - Analytical services including chemical and microbiological.
- Note: Microbiological analytical services are subcontracted out to an independent UKAS accredited laboratory.

1. ALLOCATION OF RESPONSIBILITIES

TSS Facilities Limited will undertake to explain fully the client's responsibilities under the Health and Safety Executives' approved code of practice and guidance, *The Control of Legionella Bacteria in Water Systems (L8)* and will issue the client with a leaflet, *Legionnaires' disease: A guide for employers* published by the Health & Safety executive and *A Recommended Code of Conduct for Service Providers (Issue No.5)*

TSS Facilities will draw up a comprehensive contract with our clients, which will: -

- Formally advise our clients of their responsibilities under the Approved Code of Practice.
- Define the water systems for which the TSS contracts are to provide certain services associated with compliance to ACOP.
- Define the scope of the services which TSS contracts are to provide associated with compliance.
- Define with the client any specific responsibility that they are solely responsible for (such items will be specifically identified in our formed contract).
- Be covered by the following procedures, TSS Facilities Limited quality Design and Control manual servicing, section 1 and ISO9001:2000 clauses 5.2 customer focus and 7.1 planning and realisations, 7.2 Customer related processes, PRM04 customer requirements, which is supported by QMF22 Contract Certificates.

2. TRAINING AND COMPETENCE OF PERSONNEL

TSS Facilities Limited personnel will receive and attend training courses to improve performance, awareness and competence and by following TSS Facilities Method Statements. This will ensure service works are executed in accordance with A.C.O.P. and best working practice. All training received will be supported by documentation and kept in personnel files. This is supported through external organisations i.e. Water Management Society, WTi, Mid Career College, ISRM etc. The training needs of our staff are identified through performance reviews and keeping up to date with the latest code of practice.

As part of their bi-annual assessment staff will be required to attend various sites and demonstrate their awareness, workmanship and competence through works that have been completed. A site training assessment form QMF02a is completed and copies of these will be kept in the staff personnel training records. This is also achieved by attending a number of related guidance seminars organised by Water Management Society and HSE, which allows the manager to amend procedures and re-train staff as necessary. All training records will be made available to the client on request.

Training and awareness includes the following: -

- The A.C.O.P. legislation and regulations
- Legionella awareness
- Risk assessment of water system
- Cleaning and disinfection techniques and safety
- Record keeping
- Routine microbiological sampling and testing
- Basic boiler water chemistry
- Basic cooling water chemistry
- Chemical handling
- Pre-commission cleaning & dosing techniques
- Water Regulation awareness

All personnel training is monitored, audited and recorded using TSS ISO9001:2000 quality manual system clause 6.2 Human Resources. Personnel training and development is recorded and maintained on the following forms; QMF03 Training and Development record, QMF02 Staff competency assessment which is carried out on a six monthly basis by an independent assessor, QMF03a Training Plan and L.C.A. training matrix which is audited using QMF05 internal audit report.

TSS Facilities offer basic awareness training to the client (via the risk assessment quotation) and would assist the client in choosing the appropriate training need required from the Water Management Society annual training programme.

3. CONTROL MEASURES

TSS will survey, assess the risk and design a monitoring and maintenance programme of control by site inspection, operating conditions, plant design and condition, analytical work and written reporting procedures and compliant to A.C.O.P. Precise parameters and control limits are established in our design and control manual. This will cover the selection of products, the service visit and testing procedures and control limits.

TSS uses an independent UKAS accredited laboratory for microbiological sampling. This laboratory operates a corrective audit for microbiological analysis samples where TSS is

contacted immediately. This is then reported at once to the client/named person as per our Method Statement TSS15 and corrective action, in consultation with the client, will be taken. Engineers service visit report sheets are regularly audited and the client/named person is consulted on any corrective actions necessary. The written procedures under ISO9001:2000 are in place as follows, PRM04 customer requirements, PRM05 process control, PRM09 non conforming service/product, PRM10 corrective and preventative action, PRM11 measurement analysis and improvement.

4. COMMUNICATION & MANAGEMENT

Should the control programme within our contract agreement deviate from the specification, the responsible engineer will adjust the system and the engineers visit report will formally record the adjustment. This will be brought to the site staff's attention. The named person will be notified verbally with a copy of engineers visit report left on site. Regular review meetings will also be held with the client and where control measures can be reviewed and any other necessary actions discussed, advised and documented.

Where a Legionella positive result occurs the Laboratory would notify TSS Facilities. TSS Facilities in turn would notify the client (as per our Method Statement TSS15 notification of positive Legionella result). This contains the formal procedure and chain of responsibility for notifying the client/the named responsible person. Every client file contains a client chain of named responsible person and named deputy responsible person, which is regularly updated and included in the annual water treatment review meeting agenda QMF01. Should our engineers identify any factors (including any outside our responsibility) that compromise the integrity of the water treatment programme, we will notify the site and inform the responsible person. This would be done verbally and using the Water Treatment Service report put in writing and faxed with the hard copy posted (the written procedures under ISO9001:2000 are in place as follows, PRM04 customer requirements, PRM05 process control).

5. RECORD KEEPING

TSS will retain for a period of at least 5 years a copy of all correspondence that details the history of our client's site. This would include proposals, service contract agreements, microbiological analysis results, engineers service reports, disinfection reports, risk assessments and certificates. These will be kept at TSS Facilities head office, 60 Lansdowne Place, Hove. The client is responsible for the safe keeping of the original records as detailed in the introduction of the risk assessment survey and the introduction of the Site Log Book. TSS will, where instructed, establish a site record keeping system. TSS will request the client to complete a form detailing where the client records will be kept which will be put on file. The client will be responsible for holding their own records. Details of these records, the person responsible for their completion and location of log will be detailed in the formal contract document. Written procedure under ISO9001:2000 is in place as follows PRM01 Document control and record.

6. REVIEWS

TSS Facilities Limited will formally review each contract at least on an annual basis with the client using water treatment review meeting agenda form QMF01. This will consider the following areas.

- Accuracy of current risk assessment.
- Update latest guidance, Codes of Practice (where applicable).
- Availability and completeness of site log book.

- Evidence of competence of client's staff/training review.
- Accuracy of TSS Facilities contract.
- Areas of additional concern outside and of contracted procedures.
- Agreed action points with proposed completion dates.
- Corrective and preventative actions.
- Review chain of responsibilities.

The water treatment service director Stephen Tugwell will sign on behalf of TSS Facilities the water treatment review meeting agenda QMF01.

7. INTERNAL AUDITING

Internal auditing by our Quality Manager will take place on an annual basis as per our Quality Manual procedure PRM08 internal audit supported by QMF04 audit programme. An external body will also audit our quality procedures on an annual basis including L.C.A. activities. The internal auditing will also ensure compliance with each of the service provider commitments and the requirements of L.C.A.

Any non conformance found during the internal audit will be recorded in the internal audit quality report (QMF05). The report will dictate the actions undertaken to close out the non compliance. Written corrective procedures under ISO9001:2000 are as follows PRM08 sections 4.2, Conducting the audit and 4.3, Reporting, closing non conformances supported by PRM09, Control of non conforming products and PRM10, Corrective and preventative action.

8. SUB – CONTRACTORS

Analytical samples are sub contracted to Eurofins Scientific Services, an UKAS accredited company. Eurofins undergo independent auditing in order to maintain their UKAS accreditation. All original analysis sample certificates are issued to the Client and TSS retain copies of these certificates and file as detailed in section 5.

9. DISTRIBUTION OF THE CODE

Copies of the Code of Conduct (Issue No.10) and copy of the Certificate of registration will be sent to each client with conformation form to be returned and kept on file at TSS Facilities Limited office.

Name: Mr Steve Tugwell

Position: Director

Signature: