

STREAMLINE (ENVIRONMENTAL SERVICES) LTD

STATEMENT OF COMPLIANCE

- ❖ **The Control of Legionellosis (L8)** ❖
- ❖ **Code of Conduct for Service Providers** ❖

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❖ STATEMENT OF COMPLIANCE

0. Scope of business activities

Streamline (Environmental Services) Ltd provides products and services associated with the control of Legionella, **both on a “one-off” and “contract works” basis.**

The Company only offers Legionella control services for which they are registered.

The Company's “ACoP (L8) Code of Conduct for Service Providers” Management System applies to the following scope of business activities.

- Legionella Risk Assessment Services
 - Hot & Cold Water Services
 - Evaporative Cooling Systems
- Water Treatment Services
 - Chemicals
 - Dosing and/or Control Systems
 - On-Site Analytical and Monitoring Services
- Hot & Cold Water Monitoring and Inspection Services
- Cleaning & Disinfection Services
- Legionella Analytical Services
 - Sampling
 - Laboratory Analysis
 - Interpretation of Analysis
- Plant & Equipment Services
 - Installation
 - Refurbishment
 - Servicing

The Company shall ensure that this Statement is appropriate and relevant to our business activities, and that our Procedures ensure that compliance is achieved for all the above Legionella control services, in conjunction with the LCA ‘L8 service delivery standards’.

1. Allocation of responsibilities

- In accordance with the Code of Conduct, we explain in detail the client's obligations under the legionellosis and related legislation (refer to latest editions) including i.e. :
 - (1) Legionnaires' disease. The control of legionella bacteria in water systems. Approved Code of Practice & Guidance (L8), HSE.
 - (2) The Control of Substances Hazardous to Health (COSHH) Regulations.
 - (3) The Health and Safety at Work, etc. Act.
 - (4) The Management of Health and Safety at Work Regulations.
 - (5) The Notification of Cooling Towers and Evaporative Condensers Regulations.
- Specifically, we assist clients to comply with their legal duties by advising employers and those with responsibilities for the control of premises to :
 - (a) identify and assess sources of risk,
 - (b) prepare a scheme for preventing or controlling the risk,
 - (c) implement, manage and monitor precautions,
 - (d) keep records of the precautions, and
 - (e) appoint a person to be managerially responsible.

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1. Allocation of responsibilities (cont.)

- Depending on the nature and scope of works to be carried out, we identify those services covered by the contract and those which should be provided by the client to meet all current obligations i.e. :
 - (a) company - risk assessments, cleaning and maintenance of e.g. cooling towers, evaporative condensers and hot and cold water systems in a wide variety of workplaces which may present a risk of exposure to legionella bacteria, and
 - (b) client - provision of e.g. access to premises, site log books, relevant staff (responsible person, operators) etc.

- The client's obligations under the legionellosis legislation is explained to clients at the tender stage (specifically) and in presentations (generally) by our risk assessors/ service engineers (hereafter referred to in this document as "technicians").

The respective responsibilities for each requirement are detailed in formal written agreements (i.e. quotations, specifications, etc.).

- Particularly, our method statement 'L8 (Legionella) Site Responsibilities Checklist' is prepared - post-contract award and prior to commencement of works - by our technicians.

- ❑ *Streamline (Environmental Services) Ltd* has detailed written procedures to ensure these requirements are met : CCP 01 - Allocation of responsibilities.

2. Training and competence of personnel

- In accordance with the Code of Conduct, we arrange for our personnel to attend formal training programmes associated with the control of legionella bacteria, including e.g. :
 - (1) Legionella awareness module / microbiology and origins of legionella.
 - (2) Legislation and regulation.
 - (3) Microbiological sampling of water.
 - (4) Cleaning and disinfection techniques.
 - (5) Cleaning and disinfection safety.
 - (6) Completing job sheets.
 - (7) Record keeping.
 - (8) Compliance with service provider commitments.

- In determining which training programmes are most suitable for our personnel to attend, the LCA's 'L8 knowledge matrix' is used as guidance.

- Through our training review system, we assess the competence of our service delivery personnel (i.e. risk assessors, engineers, etc.) on an ongoing basis; establishing training needs to ensure that our staff keep up to date with current best practice.

- Refresher training needs are assessed, with appropriate training provided at least every three years.

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2. Training and competence of personnel (cont.)

- Service delivery personnel competence is assessed (i.e. “site-based assessment”) via the use of a ‘training competence matrix’; scores are issued in various categories (i.e. relating to items 2. (01)-(08) above) and are used to monitor performance and progress.
- Our service delivery personnel are all highly qualified and/or experienced applied technicians, who keep up-to-date with best practice via e.g. :
 - (a) attendance of specific external training courses relevant to ACoP (L8) and the control of legionellosis,
 - (b) in-house seminars delivered by specialist consultants/ trainers covering subjects such as legionellosis and legal responsibilities, etc.,
 - (c) staff meetings - including best practice discussions and action planning.
- *However, it should be noted that assisting clients to assess the training needs of their own staff and then advising as to how these can be met is typically outside our scope.*
- ❑ *Streamline (Environmental Services) Ltd has detailed written procedures to ensure these requirements are met : CCP 02 - Training and competence of personnel.*

3. Control measures

- In accordance with the Code of Conduct, we implement a management system to assess the legionellosis prevention/ control requirements and ensure that an appropriate programme of control measures is designed, implemented, monitored and maintained. This will typically involve liaising with the client, carrying out a site survey/ risk assessment and identifying those service items which are essential for the prevention of the multiplication and spread of legionella, as per the Water Management Society’s “Site Log Book” requirements.
- The management system applied will ensure that the required actions to maintain control are implemented and remain effective, enabling corrective and preventive actions to be verified.
- We ensure that the programme of control measures designed is effectively implemented, monitored and maintained. This is achieved via i.e. :
 - (a) regular and frequent monitoring by our technicians during scheduled service visits,
 - (b) appropriate supervision of everyone involved in any related operational procedure,
 - (c) clear definition and documentation of staff responsibilities and lines of communication,
 - (d) maintenance of appropriate staff levels during all hours the water system is in operation,
 - (e) contactability of the ‘responsible person’ at all times,
 - (f) arrangements for ‘call-outs’ (where necessary) and emergency call-outs,
 - (g) display of contact details at all relevant access points, etc.

The Company is committed to ensuring the programme of control measures satisfies as a minimum the LCA Standards for Service Delivery.

- Verification that corrective and preventive actions are implemented is evidenced via :
 - (a) completion of service reports by our technicians, which are filed in the on-site log book,
 - (b) completion of nonconformance reports (NCRs) in accordance with ISO 9001 Quality Assurance Procedure(s) :

QAP 140 Corrective and Preventive Action Reporting

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3. Control measures (cont.)

- Senior management verifies the system via means of internal audits of :
 - (a) the “ACoP (L8) Code of Conduct for Service Providers” Management System in accordance with Code of Conduct Procedure(s) :
 - CCP 07 Internal Auditing, and
 - (b) the Company’s ISO 9001 Quality Management System in accordance with ISO 9001 Quality Assurance Procedure(s) :
 - QAP 170 Internal Quality Auditing
- ❑ *Streamline (Environmental Services) Ltd* has detailed written procedures to ensure these requirements are met : CCP 03 - Control measures.

4. Communication

- In accordance with the Code of Conduct, we implement management procedures to :
 - (1) Enable an appropriate response to be taken should the system operating conditions deviate from the control criteria. Where the presence of legionellosis is detected, we take remedial action in accordance with ACOP L8 guidelines (including appendix 2) and investigate the site log book (e.g. previous monitoring results, etc.) in liaison with the client’s responsible person.

Our response is carried out in accordance with the following procedure (briefly outlined). For each site we :

 - (a) carry out water sampling according to our ‘method statements’, and
 - (b) if results are outside the control limit parameters - due to the required actions being the client’s responsibility (as defined in our document ‘Regulations and Requirements Checklist’) - our technician will notify and advise the client via service reports.
 - (2) In the event of any necessary actions, we communicate with the client’s nominated personnel via a previously agreed ‘chain of responsibility’, providing written reports as appropriate.

This ‘chain of responsibility’ is recorded in the Client’s ‘Site ACoP (L8) Risk Assessment’ and/or our method statement ‘L8 (Legionella) Site Responsibilities Checklist’.
 - (3) Where we become aware of significant “matters of evident concern” which affect the control of legionellosis that fall outside our contractual responsibility, we bring these to the client’s attention; updating the specification and/ or providing written reports as appropriate.

These matters are brought to the client’s ‘responsible person’s attention by our technician, both verbally and in writing via service reports (copied to the client, the site log book and our office), in accordance with our procedure as outlined above.

Escalation Procedure

The Company shall have a formal staged escalation procedure to ensure that in the event of significant matters of concern that must be raised, these are escalated, as necessary, to the responsible person, the duty holder and, as a last resort, to the relevant enforcement agency.

This shall be carried out in accordance with the suggested LCA process.

- ❑ *Streamline (Environmental Services) Ltd* has detailed written procedures to ensure these requirements are met : **CCP 04 - Communication.**

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5. Record keeping

- In accordance with the Code of Conduct, we indicate which records are to be kept by our company and the client, where they will be kept and applicable record retention times. Additionally, we establish with the client's responsible person who will be responsible for the maintenance of said records.
- This information is recorded in the Index of the Client's 'Water Treatment Services Site Log Book', 'L8 ACoP Key Points Information Sheet' and in job/contract documents as appropriate.
- Typically, a 'site log book' is established and maintained (by the Client) which contains, as appropriate, i.e. :
risk assessments, schematic diagrams, flow diagram, safety data sheets, laboratory analysis results, test certificates, service reports, etc.
- This information is recorded/ indicated in our 'L8 ACoP Key Points Information Sheet'.
- Duplicates of all records we supply to the client site log book are kept/ located in our 'client job files'.
- ❑ *Streamline (Environmental Services) Ltd* has detailed written procedures to ensure these requirements are met : CCP 05 - Record keeping.

6. Reviews

- In accordance with the Code of Conduct, we establish programmes that allow both our company and our clients to formally review all aspects of the agreement covering system management and the control of legionellosis. Reviews are held at least annually, or more frequently depending on water monitoring results, and are scheduled at the programme design stage.
- Reviews are conducted by our senior managers/ engineers in liaison with the client's responsible person and any other personnel identified in the scheme's 'chain of responsibility' deemed appropriate.
- It should be noted that reviews are conducted on repeat business (i.e. "contract works") but not on one-off jobs.
- Records of these reviews - along with any actions taken/ to be taken arising from said reviews - are kept and copied to the client and our 'client job files'.
- ❑ *Streamline (Environmental Services) Ltd* has detailed written procedures to ensure these requirements are met : CCP 06 - Reviews.

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7. Internal auditing

- In accordance with the Code of Conduct, we implement internal auditing management systems that ensure the self-auditing of our company's compliance with the 'Service Commitments'; all legionellosis prevention and control programmes are audited at least once a year against an audit schedule/ plan, with formal records (i.e. internal audit reports) kept.
- The internal auditing management systems applied include corrective action programmes that ensure that any non-compliance identified is corrected in a timely manner, with action taken to prevent its recurrence, as appropriate.
- Code of Conduct Procedure CCP 07 'Internal Auditing' contains a separate written management procedure (extract) for the timely correction of non-compliances (NCRs) in accordance with ISO 9001 Quality Assurance Procedure(s) :

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- All internal audits are carried out by qualified and experienced auditors, who are independent of the service delivery process, in accordance with internationally recognised auditing standards and best practice.
- ❑ *Streamline (Environmental Services) Ltd* has detailed written procedures to ensure these requirements are met : CCP 07 - Internal auditing.

8. Sub-contractors

- In accordance with the Code of Conduct, we have a management procedure to ensure that any sub-contractor holds an independent registration under the Code of Conduct.
- We also ensure that all activities carried out by this third party are compliant with the Code of Conduct and any relevant legislation.
- We use sub-contractors for **(a)** laboratory analysis. A 'flow chart' procedure exists that details all controls relating to our relationship with any such sub-contractor, how this is recorded and the actions taken to correct any non-compliance.
- Also, we use sub-contractors for the following services : (b) legionella risk assessment and (c) hot and cold water monitoring.
- Further, we sub-contract : (d) water treatment – only to LCA accredited companies.
- The Company shall obtain competence assessment confirmation from sub-contractors for operatives that work on Streamline sites.
- Updates of these shall be monitored as part of internal audits.
- ❑ *Streamline (Environmental Services) Ltd* has detailed written procedures to ensure these requirements are met : CCP 08 – Sub-contractors.

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9. Distribution of the Code

- In accordance with the Code of Conduct, we implement management systems that ensure all clients to whom we provide services associated with the control of legionella bacteria are supplied with a copy of the 'Code of Conduct' and our 'Certificate of Registration'. Issue of these documents is evidenced in client job files and monitored/ audited against current client lists.
 - Copies of the 'Code of Conduct' and our 'Certificate of Registration' are issued to clients at the post-contract award stage, for inclusion in all 'office' and 'site log books' as appropriate.
- Streamline (Environmental Services) Ltd* has detailed written procedures to ensure these requirements are met : CCP 08 - Distribution of the Code.

❖ Code of Conduct Procedures Index

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- CCP 08 - Sub-contractors
- CCP 09 - Distribution of the Code