

LCA Statement of Compliance

Scope of Activities

Caledonian Heating & Plumbing Ltd (CHP) are a commercial heating, plumbing and water management company. We have an extensive portfolio of public and private sector clients, delivering bespoke solutions across commercial, educational, sporting and healthcare facilities across Scotland. Caledonian Heating & Plumbing Ltd aim to provide a complete service for all our clients, including maintenance, repair/refurbishment, installations, supply and design, and services designed to control the risks associated with legionella bacteria.

The company has a documented Integrated Management System (IMS) which is certified to BS EN ISO 9001:2015 and BS EN ISO14001:2015.

As a member of LCA we comply with the LCA code of Conduct by following documented procedures which are structured to comply with legislation, primarily the Control of Substances Hazardous to Health (COSHH) Regulations 2002, Approved Code of Practice L8 and Guidance HSG 274 Parts 1-3.

SERVICE PROVIDER COMMITMENTS OF THE CODE

1. Allocation of Responsibilities

1.1 Caledonian Heating & Plumbing Ltd holds LCA Registration for the following service categories, this can be verified using the LCA website www.legionellcontrol.org.uk. LCA certification and the code of conduct can also be viewed on our website at <http://www.caledonianheating.co.uk/trade-associations>

- **Legionella Risk Assessment of Domestic Hot and Cold Water Supplies**
- **Hot and Cold Water Monitoring and Inspection Services**
- **Hot & Cold Water Systems Cleaning and Disinfection Services**
- **Legionella Monitoring Services**
- **Design, Supply, Installation, Servicing/Maintenance and Refurbishment, Plant and Equipment.**

1.2 Caledonian Heating & Plumbing Ltd clearly states the services covered by our LCA Membership (which are listed above) in any offer and contract agreement with the client, in addition, CHP makes clear the respective responsibilities in the control of legionella to ensure that, where relevant, the client understands their duties under:

- The Health & Safety at Work Act 1974.
- The Control of Substances Hazardous to Health Regulations 2002.
- The Management of Health and Safety at Work Regulations 1999.
- The HSE Approved code of practice (ACoP)L8 “Legionaires’ Disease- The Control of legionella bacteria in water systems” & associated technical guidance as detailed in HSG 274 Parts 1-3.
- The Plumbing notifications requirements in accordance Scottish Water Bylaws.

CHP will confirm in writing, at quotation or contract formation stage, the responsibilities of the client and CHP (as the Service Provider) under the relevant parts of ACoP L8 and associated guidance for the services provided.

CHP’s quotations are created and issued in accordance with IMS/1- IMS Manual section 4.1 Control of Enquiries and Sales. Issued quotations state both CHP’s and the prospective client’s obligations under the

LCA's Code of Conduct and the prospective client's statutory obligations relative to the control of legionella.

2. Training and Competence

- 2.1 The IMS document ref P-16 Training and Competency Policy details CHP's approach to identification and provision of training and review of its effectiveness via ongoing competency assessment. This includes training relevant to awareness and control of Legionella.
- 2.2 The training status of each member of staff is reviewed at least annually via an electronic matrix ER2 Training. As part of this process, on-going staff competency assessments are conducted through several means, which may include:
 - Site inspections (carried out in compliance with IMS document ref F-Q31.
 - Annual process audits see section 7.
- 2.3 Training and competence records are recorded and retained electronically as per 2.2.
- 2.4 Significant industry developments, safety alerts and/or good practice is shared with relevant staff members by way of tool-box talks.

All of the above are formally recorded and brought to the attention of relevant managers and staff.

3. Control Measures

- 3.1 All the Legionella control services which are offered by Caledonian Heating & Plumbing Ltd as listed in 1.1 are registered with the LCA and are stated within the written agreement with the client as per 1.2.
- 3.2 In discussions with new and existing clients we prefer to assess and review the requirements of the client by carrying out a Legionella Risk Assessment or Review. We would advise that an up to date risk assessment is recommended by the ACoP L8 and that this will list written control measures for the water systems within their site. Where there is a recent assessment, this will be requested so the water hygiene program can be based on the recommendations made within the document. If additional information is required a visit will be completed by the Water Hygiene Manager to survey the site. Following the assessment or review we will identify the procedures that the client should instigate and ones that we can complete, if required. We provide the most practical and effective advice through discussions and written information. This will take the form of a control scheme based on the requirements for the site in relation to the recommendations with L8 & HSG274. These discussions will center around the operational suitability of the options available, such as sites that need to remain operational and those that are empty. All services will be in line with method statements and risk assessments specific to the individual scope of work's. All regular services provided by CHP are recorded on our CRM system by the admin staff. Where a service alert is raised, the client is contacted to arrange for the scheduled works to be booked. If the client cannot book the works in or decides not to proceed with the recommended service, CHP will formally advise the client of the compliance issues that may arise. This is via email and a follow up letter is sent by the admin staff. Confirmation that the works have been carried out is completed by the admin staff. CHP's IMS document "OP-4-02 Water Management"
- 3.3 Following each visit an electronic report is submitted to the client contact for their records and to detail any items that require further attention or recommendations for future works. Any issues

should be followed up prior to the next scheduled visit. If an agreement on changes/works is not made after the visit, this is recorded on our CRM by admin staff and Contract Manager as per OP-4-02 Water Management.

- 3.4 For clients who have log books they are advised to file all reports in their log books.
- 3.5 Water Hygiene testing equipment to be calibrated and certificates maintained. Thermometers are calibrated against a standard reference.

4. Communication and Management

- 4.1 The appropriate contacts for all service users are obtained using LCA-CID-1 to ensure that communication is directed to the correct person within the organization. The agreed reporting contacts and details are captured during the initial survey using these forms, this information is then transferred to the contacts in our CRM system by the Contract Manager or admin staff (OP-4-02 Water Management).
- 4.2 Where out of scope readings are obtained which may indicate that maintenance procedures have lapsed within the control measures set out in the Legionella Risk Assessment then we contact the client to discuss further. OP-4-02 Water Management. Information on actions required to resolve or manage the issues is discussed. The client is advised that a review of the systems should be carried out to ensure control measures are reinstated or reviewed. This may also mean a review of the Legionella Risk Assessment should be undertaken, depending on the issues. In the event of any additional actions we communicate with the client and/or their nominated contact in line with the reporting procedures defined by client for the reporting non-conformances to the client, usually a phone call and/or email.
- 4.3 Where we become aware of significant issues affecting the control of Legionella that are outside the agreed terms of our contract, these are brought to the client's attention by the Contract Manager. We then assist the client, where possible to understand the issue and recommend the necessary actions to be taken to address the situation. Written advice is sent to the client with the necessary actions is also issued to the client.
- 4.4 Formal staged escalation of significant matters of concern are raised to the identified responsible person and/or duty holder as per our escalation procedure, using our Escalation Letter LAC-ESC-1.

5. Record Keeping

- 5.1 Standard quotes identify the records that are to be maintained to support the Legionella control Scheme.
- 5.2 Standard quotes clearly defines which records are to be kept by each party; where and how.
- 5.3 As part of the standard quote, we advise clients of their responsibility to retain records for 5 years.

6. Reviews

- 6.1 Annually we undertake a contract performance review with the client using LCA-CID-1 to gather up to date information and completion of LCA-CRO1 by Contract Manager.
- 6.2 Where clients are identified as requiring further training to develop knowledge and understanding of their systems and requirements for management and control of Legionella, we recommend training bodies who can help develop training for staff. This is typically undertaken during the annual review meeting and is an agenda item on the standard annual review form LCA-CRO1.

7. Internal Auditing

- 7.1 A director for CHP undertakes an annual internal review of our LCA management procedures and method statements to ensure that the method statement still complies with the LCA standards.
- 7.2 A representative sample of records from all aspects of the service delivery should be included in the audit to ensure the systems are effective and being applied. Any non-conformances are followed up to ensure that all actions are completed. Forms F-Q2.02 and F-Q31 are used to complete. Timescales identified within the internal audit for non-conformances are to be met.
- 7.3 Corrective actions are undertaken this includes reviewing any procedure or policy affected by non-conformance which will be reviewed and updated as required.
- 7.4 CHP are ISO:9001:2015 accredited, all documents are controlled and any changes are managed in accordance with ISO and recorded in F-IMS20- Document Register. Old documents are removed and archived from our system.

8. Sub-Contractors

- 8.1 CHP currently do not use sub-contractors for site work. We use an UKAS accredited Laboratory to provide independent analysis of water samples. The water samples are collected by CHP operatives (in accordance with method statement) and taken to the laboratory or agreed pick up location. The Laboratory UKAS accreditation is checked annually as part of the internal audit.
- 8.2 If CHP require the services of a sub-contractor for any work then we will use only an LCA registered contractor and confirm that they are registered for the services required by checking the LCA website, with the current certificate obtained,
- 8.3 Any sub-contractor will have to complete CQF-1-4 Contractor Assessment Form, to check competency and appropriate insurance, H & S standards are in place.
- 8.4 The internal audit is used to confirm the correct activities of any sub-contractor used.

9. Distribution of the Code

- 9.1 A copy of the code of conduct and evidence of our LCA membership is available on our website.