



EPSCO

SETTING STANDARDS
IN WATER QUALITY

Cleaning
Disinfection
Inspection
Assessment
Consulting



LCA Code of Conduct

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Statement of Compliance

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1. Allocation of Responsibilities

1.1 Clients Obligations under the Legionellosis Legislation

As a responsible service provider, EPSCO has in place management system processes that ensure clients are aware of their obligations under Legionella legislation. Obligations are discussed and explained verbally during the service specification process, with further information presented in written form via formal written proposal and quotation documents as per Management System Process (MSP) #001. This MSP is incorporated into processes for provision of all relevant products and services. The following documents are available via the EPSCO & HSE websites: -

- The Control of Legionellosis: A Recommended Code of Conduct for Service Providers,
- HSE ACOP L8 (if the client does not already hold one)
- EPSCO LCA Statement of Compliance
- LCA Certificate of Registration

Clients should also reference the 1974 Health & Safety at Work etc Act, the Control of Substances Hazardous to Health Regulations 1999, the Management of Health and Safety at Work Regulations 1999 and Notification of Cooling Towers and Evaporative Condensers Regulations 1992 which can be found via the HSE websites.

1.2 Identification of services covered by the contract and those which should be provided by the Clients

EPSCO carries out a variety of services related to our clients' water system plant and equipment including:-

- Cleaning and disinfection of various domestic, potable and industrial water systems (MSP#003).
- Monitoring and Inspection of Hot and Cold Water Systems (MSP#033)
- Water System Risk Assessment Services (MSP#030)
- Potable Water Plant & Equipment Services (MSP#035)
- Site Potable Water System Management Training Suites (MSP#032).
- Other Bespoke consultancy on all aspects of a clients' water management

The services and potential scopes of work noted above to be provided by EPSCO with respect to a particular contract are clearly stated in service quotation templates (F31, F32, F33, F34, F36, F37, F37.1, F39, F40, F77, F78, F79) and supplemented where required in more detail in a formal proposal document. Actions that are the responsibility of the client and aspects of legislation that are expressly not covered during a service scope by EPSCO are noted these documents for routine works and often also for ad hoc work scopes.

1.3 Formalised Agreement Detailing Respective Responsibilities

A formal written agreement is created through the issue of the scope of work proposal and quotation documents by EPSCO, and acceptance by the client through the issue of a work/purchase order. Detailed responsibilities, actions and job steps are included in these documents, with an appropriate Method Statement noted to be followed. This process is detailed in EPSCO MSP#001 and 018.

1.4 State in Formalised Agreement LCA Registration for Services Provided

The formal written agreement explicitly states that EPSCO has LCA registration for the service categories being provided. This is clearly stated in service quotation templates.

2. Training & Competence of Personnel

All aspects of training and competency are carried out in line MSP #012 –Training, competency and personal development.

2.1 Details of Training

All EPSCO personnel are recruited having gone through an extensive selection programme. They are recruited specifically to be trained to deliver individual or multiple tasks related to legionella control and water system

management. We carry out operatives training in line with our in-house EPSCO Training Programme (F-HSQ67) which develops operations staff through 5 stages over an 18-36 month period. This consists of internal training and modules from external providers (such as the WMS, City and Guilds etc.) that are organised into the 5 stages with reference to the LCA matrix modules: -

- Introduction to EPSCO
- Technician Level 2
- Technician Level 1
- Team Leader
- Project Manager

Regular refresher training and information is communicated through Team Meetings and Monthly training topic briefing delivered by management to the operations team. All staff are also regularly assessed and appraised over a 6-monthly rotation, with the process managed through a combination of a self-appraisal worksheet (F27) and a performance appraisal (F14). This allows us to make plans for the development of individual members of staff.

Staff responsible for undertaking Legionella specific tasks are trained externally by accredited/certified training bodies and refresher training is carried prior to certificate expiry or if deemed necessary.

2.2 Competence, Training & Best Practice

Competence through practical and desktop assessment is assured at each of the 5 stages of operational training (F-HSQ67), with an operative only being approved and certificated following successful demonstration of skills and knowledge. In addition to these core competence levels our operations department also maintain a Task/Site Competency Matrix (F-TP84) to ensure our allocated teams possess the requisite skills and experience

As an organisation we are members of The Institute of Water, The Water Management Society, The British Safety Council and The Royal Society for the Prevention of Accidents and subscribe to a number of publications relating to the industries in which we work. We maintain a comprehensive library that covers Industry Standards, Codes of Practice, Health and Safety Legislation and Guidelines, and a broad-based Technical Reference Library covering all encountered areas.

2.3 Clients Training Needs

All duty holders of legionella risk systems require a sufficient level of competence. Where EPSCO is required to assess competence as part of any service delivery scope this shall be done with reference firstly to client staff roles & responsibilities and tasks being undertaken along with the LCA training matrix. An assessment will then be made to include:-

- Knowledge & understanding demonstrated of tasks.
- Familiarity with required documentation & records.
- Adequate practical completion of steps on system.
- Evidence of formal training courses conducted (certs).

During a Legionella Risk Assessment, clients training needs are identified through the training section of the LRA Report which highlights any training needs. For Clients with a contract, training needs are discussed during the formal contract review with the client.

Client competence relevant to other scopes of service delivery will be appraised via demonstration of skills/knowledge & understanding throughout service delivery process. Any notable deficiencies significant to legionella control will be raised as observations or defects as part of "Completion Report".

Where our clients require further training to develop knowledge and understanding of their systems and requirements for the prevention of Legionellosis, EPSCO maintains a contact list of approved and recommended skilled, qualified and experienced training bodies that can assist in developing competence. This is done primarily through reference to the LCA Training Matrix and network of approved providers.

Where appropriate EPSCO can provide client training on certain aspects of legionella control, tailored to the particular sites needs as required or via proprietary e-learning modules for Marine & Offshore risk systems. Where this is appropriate it will be provided in line with MSP#032.

3. Control Measures

3.1 Management System to assess requirements and ensure appropriate programme of control measures is designed, implemented, monitored and maintained.

EPSCO maintains a management system that ensures all aspects of our legionella control activities are designed, implemented, monitored and maintained so as to provide the highest standard of compliance and risk management.

3.1.1 Design

EPSCO provides Legionella Risk Assessment that provides recommendations as to the design of control measures. These include the nature and frequency of actions to be put in place such as flushing or dosing levels. The LRA process generally is designed in line with BS8580-1:2019, and is aimed at providing the most practical and effective advice. This process is managed by MSP#030. Design of controls is also inherent for EPSCO specify and supply equipment and plant that is designed for legionella control. When this service carried out a full examination of the best practise options is considered, including a site, survey, examination plans and schematics, and cross checking with other component personnel to ensure the solution(s) are going to be effective and fit for purpose. This process is managed in line with MSP#035. All service processes are to be delivered in line with an agreed Methods Statement Specific to the individual work scope (as per MSP#014).

3.1.2 Implementation

Upon instruction and agreement with the client and duty holder EPSCO will implement legionella control programmes such as periodic cleaning & disinfection, fouling or hygiene inspections, periodic system sampling, and or water system risk assessment and reviews. EPSCO services are all delivered in line with a site specific written Method Statement, within individual services such as chemical cleaning and disinfection using an asset specific specification and treatment plan (F-SF04). All service areas use checklists and plans to ensure services are delivered fully, accurately and without variation.

3.1.3 Monitoring

EPSCO monitors many aspects of programmes of control measures. We ensure our own service controls are delivered in line with the code and internal standards through photographic and endoscopic images before and after cleaning, along with instant point of work legionella checks following cleaning. Other aspects of control measures are monitored on site such as EPSCO's Completion Report's Observations section (F-SF37) on system condition and performance will also act to inform the client of effectiveness of a control regime. Should the condition of an item require an increase or decrease in the frequency of cleaning and / or disinfection EPSCO will bring this to the attention of the client. Our inspection and monitoring services allow clients to view and monitor the levels of cleanliness within their systems following detailed procedures and reporting. This ensures that all inspections cover all aspects required with regard to legionella control and nothing is missed. This process is managed in line with MSP#033.

3.1.4 Maintaining

Regular cleaning and disinfection visits are triggered in line with 2.1, 2.2 of MSP#003, using Electronic Alarm system. This is also the case for Risk Assessment services with regard to review, follow up on remedial action plans or inspection findings. Where a service alert is raised, EPSCO management contact the particular client to arrange for the scheduled works to be booked in. Where the clients is unable to schedule the services or decides not to, EPSCO management continue to follow up and inform the client of their obligations and the risks this may lead to. This EPSCO system always ensures capacity is maintained to implement any scheduled programmes through giving this work priority over other ad hoc works.

Where scheduled visits are missed, facilities exist to ensure subsequent visits return any relevant systems to a satisfactory operating condition as part of our Non-conformance, Corrective & Preventative Action (MSP#005)

3.2 Corrective & Preventative Actions

Such actions are administered through MSP#003, Step 3.3 and are carried out in line with MSP#005 Non-conformances, Corrective and Preventive Action. Our onsite records and completion reports are updated at each visit and act to inform ourselves and our client of any items that require further attention or change. This is a continuous programme that is fundamental to our commitment to achieving and maintaining a high level of service and continuous improvement. Where Legionella positives are encountered WI-57 is utilised for the corrective actions to be taken.

Where audit, review or an incident requires Corrective/Preventive Actions to be taken internally by EPSCO regarding its own operations these will be carried out using our HSEQ Management System – Process #005.

3.3 LCA Standards for Service Delivery

Each EPSCO MSP for service delivery is written to encompass all elements of the corresponding LCA delivery standard. i.e. MSP030 covers every element required by the delivery standard for Legionella Risk Assessment. The content of these MSP's is reviewed annually and adhered to via the *Internal Audit Programme* as part of the overall integrated management system in line with MSP#013.

4. Communication & Management

4.1 Deviations from Control Criteria

The first part of this section of the code generally relates to deviations from specification e.g. a client experiencing a positive Legionella result(s). Under normal circumstances should a failure or non-conformance occur it would be either the client or the client's representative who informs us. Generally EPSCO would make a team available at the earliest time to carry out an ad hoc cleaning and disinfection procedure. All responses to positive legionella results are carried out in line with WI-57.

Where EPSCO is delivering risk assessment services with regard a potable water system where failures in legionella control have occurred, a full investigation of the root causes of the failures will be carried out. This will include an assessment of the implementation of any required or suggested control measures to prevent any such failures. Where asked to remediate water systems following deviations and failures EPSCO will also carry out investigation of the causes in order to help our client prevent future re-occurrences. Defects, non-conformances, along with suggested controls and remedial actions will be detailed as part of LRA Report (F-SF29) or Post Works Completion/Observation Report submitted to the client. Each remedial action will also note a timescale that we recommend it be completed within.

4.2 Communication of Necessary Actions

JORC On-site job sheets (F-SF08) are used to record information with regard necessary actions identified during a cleaning project, although during an inspection service delivery – actions will be noted within the survey checklist. This information will include details on the actions required or areas to be investigated. Where possible these will be communicated to the client's point of contact on-site, however they will always be documented in the Observations section of the Completion Report along with the Cleaning & Disinfection Certificate. Where an item is brought to the attention of our client for corrective action and has not been acted on since a previous site visit we will continue to bring this to our clients' attention and if the item is deemed critical it will be further highlighted. In the event of any necessary actions, the client's nominated personnel's contact details are recorded on the Site Report (F-SF01). In the case of Offshore works it is difficult to determine relevant personnel until on board the platform. Contact details for Duty Holders and Responsible persons are obtained only when the work scope begins. When any reports are sent a read receipt is requested as confirmation the report has been received.

4.3 Other Significant Matters affecting the Control of Legionellosis.

Any significant matters specifically relating to the control of Legionellosis which EPSCO personnel become aware of that are outside of EPSCO's direct responsibility will be brought to the client's attention in line with MSP#003, steps 3.3. This will be administered using the (F-SF08) JORC on site immediately after the services are completed and using the Completion Report (F-SF37). Where issues are perceived to be critical to legionella control they will be raised immediately on-site to allow immediate isolation of the system and corrective action. In this situation these actions will also be detailed in a covering letter to the client accompanying the paperwork. In the event of any necessary actions, the client's nominated personnel's contact details are recorded on the Site Report (F-SF01).

4.4 Escalation Procedure

EPSCO has a legal and moral responsibility to ensure that any critical defects relating to the control of Legionellosis are communicated to the client and actioned in a timely manner in order minimize any risk to the lives of staff, contractors or members of public. The escalation procedure EPSCO will adopt should no action be taken is as follows:

Stage 1 – Initial Report to Responsible Person

EPSCO will raise the concern verbally when identified and via JORC (F-SF08). This will be followed up with Completion Report (F-SF37) and covering letter as outlined in step 4.3. EPSCO will make note on Site Report (F-SF01) that a critical defect has been raised and this must be enquired about when next scheduled service call is due to ensure it has been appropriately actioned.

Stage 2 – Escalation to Duty Holder If no action has been taken or planned within a reasonable timescale when communication reopens with client, EPSCO will issue a follow-up letter stating that if no action is taken then a formal escalation will be initiated via Critical Defect Escalation Letter (F-SF12). If it is necessary to escalate the matter, EPSCO will write to the Duty Holder, formally outline the concerns and seek a commitment to act. All dialogue and communications from this point will be recorded and stored in a file for reference should the matter escalate further.

Stage 3 – Report to the Regulator If after formal escalation of the issue and explanation in writing to client they continue to ignore the problem this process and EPSCO feels there is still a risk of serious personal injury or risk to health, we will report to the HSE by completing their concerns form using the following link:

<https://webcommunities.hse.gov.uk/connect.ti/concernsform/answerQuestionnaire?gid=594147>

5. Record Keeping

5.1 Records which should be kept by both parties.

EPSCO maintains records of all works carried out over the past 7 years in line with MSP #009. Clients are informed to keep records for a minimum of 5 years as stated in the service quotation. These include but are not limited to:-

- Contractual details and copies of documents submitted to the client.
- EPSCO Cleaning and/or Disinfection Certificate(s)
- Completion Reports – Observations/Defects/Recommendations.
- JORC On-site Job sheets
- Waste Transfer Notes
- Digital Images showing system condition, prior to and following cleaning routines.
- Record of Treatment, Monitoring & Discharge (F-SF21) (Where appropriate on work scope)

5.2 Responsibility for Maintaining Records

All documentation is submitted to our clients nominated personnel normally within 4 days of completing a job. A copy is maintained at EPSCO for both our records and use and should our client require further copies. EPSCO

has a policy to hold copies of all records for a period of 7 years and this is administered through our MSP#009. EPSCO completion paperwork states the time the record should be held for. F-SF10 Cleaning and Disinfection Certificate notes "This certificate should be retained for 5 years for your records". Client's contact details are recorded at the initial enquiry stage and are recorded on the Site Report (F-SF01).

6. Reviews

Ad-Hoc Service Contracts:-

Scopes of Work carried out on an individual basis will be reviewed following completion only, with aspects of system management and legionella control covered in the *Completion Report*.

Contracts for ongoing services:-

With contractual type legionella control works such as "routine & repeat" cleaning, disinfection (MSP003), inspection, monitoring, or sampling (MSP033), EPSCO will complete an annual Contract Review in line with each MSP. This includes examination of previous works, rates, frequency, systems conditions, system changes or additions. In addition further dedicated system surveys and meetings may be initiated with individual sites as required to determine the plan moving forward. Together with clients, EPSCO documents all the requirements for the following year and re-submits a formal schedule of control services. Where possible this annual review will encompass a face to face meeting, but due to the nature of the contracts with large organisations, covering several smaller sites, the majority of review will often take place via email and phone communication.

On approval of the annual schedule at the Contact Review appropriate changes will then be made to EPSCO Scheduled Programme of Works for the particular Client/Sites.

7. Internal Auditing

7.1 Service Provider Compliance Internal Auditing

Auditing will be carried out in line with the *Internal Audit Programme* as part of the overall integrated management in line with MSP#013 – Internal Audit details all the applicable steps and responsibilities required for internal audit of the systems and service provision within the company.

The main processes are stated in section 1.2 and are audited as required in line with the level of works being carried out, but at a minimum on an annual basis.

In addition to these internal process audits, the company also carries out an annual compliance with the code of conduct audit which ensures our systems are satisfactory in line with the requirements set down by the BACS/WMS Code of conduct for service providers. This is carried out using the Audit Process and Checklist (F-Q10) with evidence of compliance noted under each area. Where non-conformances are identified during the audit process they are dealt with using MSP #005. This process involves the creation of a Corrective Action form which monitors the status of the issue until it is resolved.

Audits carried out by the designated competent person trained in line with requirements for internal auditors. That person is appointed based on the knowledge, ability and experience to carry out the audit.

7.2 External Audit

Our Compliance with the code of conduct is externally audited by the Legionella Control Association on a periodic basis as required for continued registration as a service provider.

8. Sub-Contractors

The only subcontractor used by EPSCO is a suitable external UKAS accredited laboratory for water analysis. All sub-contractors are approved using MSP#022 - Vendor Approval and HSQ-24 QHSE Supplier Approval Questionnaire.

9. Distribution of Code

EPSCO make available the current Code of Conduct and LCA registration Certificate to all clients on the company website www.epsco.co.uk/management-systems

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