



## LCA Statement of Compliance

## LCA - Statement of Compliance

<p><b>0</b></p>	<p><b>Introduction</b></p> <p>Hatrack Bruce Ltd, founded in 1975 is a Multi Trade Company specialising in Building, Civil, Mechanical and Electrical Engineering, based in the town of Milnathort. The company currently employs in excess of 50 staff covering the various trade operations and services the construction requirements of the Healthcare, Public, Utilities, Oil and Petrochemical, Defence and Custodial Sectors with works on Refurbishments, New Builds and Facilities Management Projects. Hatrick Bruce Ltd operates within the umbrella of the Purvis Group of companies.</p> <p>This statement of compliance to the Legionella Control Association’s Code of Conduct for Service Providers details how Hatrick Bruce Ltd (HBL) conducts its business operations to ensure that it fulfils all of the nine service Provider Commitments as set out in the Code of Conduct and that it endeavours to ensure its practices and procedures provide its clients with a service that is fully compliant with current legislation and guidance; in particular the HSE Approved Code of Practice and Guidance Document ‘Legionnaires disease; the Control of legionella bacteria in water systems (ACoP L8) 4<sup>th</sup> edition’.</p> <p><b>Scope of Activities</b></p>
	<p>In accordance with the LCA’s Service Standards, Hatrick Bruce Ltd provide the following services;</p> <ul style="list-style-type: none"> <li>• Cleaning &amp; Disinfection Services</li> <li>• Legionella Analytical Services – Sampling and Laboratory Analysis</li> </ul>
<p><b>1</b></p>	<p><b>Allocation of Responsibilities</b></p> <p>Hatrack Bruce Ltd will prepare a service agreement, dependant on the nature and scope of works to be carried out, which will be submitted to the client and which will identify that the Customer has obligations under legislation.</p> <p>The Service Agreement quotation shall identify where information can be found (HSE Website) for details of these obligations and that agreeing to the terms of the Agreement, they have acknowledged that they have been advised on the obligations of the duty holder has under legislation.</p> <p>This Service Agreement will set out the required services for which we are contracted to provide, associated with the control of Legionella, following discussion with the client and all requirements have been identified, outlined and defined in conjunction with current legislation and guidance as detailed below;</p> <ul style="list-style-type: none"> <li>• Health &amp; Safety at Work act 1974</li> <li>• The Control of Substances Hazardous to Health 2002</li> <li>• The Management of Health &amp; Safety at Work Regulations 1999</li> <li>• Health &amp; Safety Executive ACOP L8 – Legionnaires Disease, the control of legionella bacteria in water systems 2013</li> <li>• Health &amp; Safety Executive HSG 274 Part 2 2014</li> <li>• The Water Supply (Water Fittings) Regulations 1999 (Water Bylaws in Scotland)</li> </ul>

- BS 7592 Sampling for Legionella in Water Systems. Code of Practice
- BS 8580: 2010 Water Quality. Risk Assessments for Legionella Control. Code of Practice

The Services which are provided by Hatrick Bruce Ltd (directly or by our representatives) are identified below. Any other required services relating to legionella associated risk reduction will be provided by the client and/or the clients nominated sub-contractor.

- Cleaning & Disinfection Services
- Legionella Analytical Services – Sampling and Laboratory Analysis

The Service Agreement sets out the following;

- Formally advises the client of their obligations and responsibilities as defined under the Approved Code of Practice.
- Define the Water Systems for which Hatrick Bruce Ltd contracts to provide services associated with compliance with the ACoP.
- Defines the scope of services which Hatrick Bruce Ltd contracts to provide, associated with compliance.
- Defines the additional duties and tasks that Hatrick Bruce Ltd does not undertake under the contract and for which the client must make his own arrangements to adhere to for compliance.
- Confirms that HBL and/or its representatives as Service Providers are LCA Registered for the service categories being provided.

Where ever possible, the client will be encouraged to sign and return the service agreement as his acceptance of this.

The provision of Service Agreements/Quotations (*HBL125 – Service Agreement Template – Water Services*) will be carried out in line with HBL Company Procedures (*HBL352 – Water Treatment Services Procedures*)

## 2 Training and Competence of Personnel

All staff dealing with the appropriate service provision receive training in the appropriate areas, this being supported by HBL Company Procedures (*ref; HBL120 – Staff Training Procedures*)

As a minimum staff will have completed courses in Water Regulations and Legionnaires Disease training supplied by an LCA recognised and accredited training supplier. This training will be provided on an as-required basis and every five years as a minimum. Determination of which training programmes are required for our personnel to attend, the LCA's L8 Knowledge Matrix will be used as guidance. (*ref; HBL365 – Competence Verification Record*)

Training records, recording the attendance of training courses will be kept in individual HR files and all training is recorded and maintained at group level for all operatives within the company training matrix.

Client Training is not provided by HBL. Where Client Training is required, they shall be informed of suitable Training centres and/or Authorised Personnel who will be able to meet and carry out training requirements.

<p><b>3</b></p>	<p><b>Control Measures</b></p> <p>In accordance with the LCA Code of Conduct, we maintain a management system to assess and control the legionella prevention and control requirements and ensure that an appropriate programme of control measures is designed, implemented, monitored and maintained. This system will vary from client to client and contract to contract but will typically involve liaising with client, carrying out site survey's, water sampling and communication of findings and non-compliances.</p> <p>The Management system applied ensures that required actions to maintain control are implemented and enable corrective and preventative actions.</p> <p>The above requirements will be achieved by adherence to HBL Company Procedures (<i>HBL352 – Water Treatment Services</i>) and operational Method Statements.</p> <p>The LCA Standards for Service Delivery are maintained through the HBL Internal Audit Process (<i>HBL 351 - Internal Audit Record</i>).</p> <p>For the provision of Analytical Services of Water Samples, the sole use of UKAS accredited Laboratories for this provision will be maintained.</p>
<p><b>4</b></p>	<p><b>Communication</b></p> <p>The following Management procedures are carried out to ensure all woks are carried in compliance with HBL Company Procedures (<i>HBL352 – Water Treatment Services</i>);</p> <ul style="list-style-type: none"> <li>• Each Service Agreement will record agreed routes of communication and confirm client nominated person for the communication of results and reports and liaison of control measures. Communication will normally be carried out via email.</li> <li>• In the event of a result being obtained falling outside of the identified control parameters identified within the Service Agreement, these results will immediately be passed to the client nominated contact stating conditions, location and nature of failure along with supporting test results and Site Logs as appropriate.</li> <li>• An appropriate response shall be taken should the system conditions deviate from the control criteria. Where the presence of Legionella is detected, we shall take remedial actions in accordance with guidelines and liaising with client responsible person.</li> <li>• In the event of any necessary actions, we communicate with client nominated personnel providing written reports as appropriate.</li> <li>• Where 'matters of evident concern' become evident through the execution of our service agreement and which affect the control of legionellosis but fall outside our contractual responsibility, we will bring these to the attention of the client by way of a formal report along with any supporting documentation relevant. These matters will be communicated to the client's nominated person both verbally and in writing (by way of written site report) and confirmed by email.</li> </ul>

	<ul style="list-style-type: none"> <li>Correspondance and confirmation of agreed routes for communication will be kept on file within dedicated contract Folders within company filing system.</li> </ul>
<b>5</b>	<b>Record Keeping</b>
	<p>All records for Hatrick Bruce Ltd are stored electronically on the company shared server in a contract/customer specific folder and depending on size and scope of the client, under further sub-headings as required. This includes completed Service Agreement documentation, quotations, service reports, inspection reports, relevant correspondence and test results.</p> <p>Additional site-specific information, reports, correspondence and test results will be electronically stored within individual Contract specific folders within the HBL filing structure on the company server. The system is electronically backed up on a daily basis to an offsite location.</p> <p>All record keeping will be carried out in accordance with HBL Company Procedures (<i>HBL352 – Water Treatment Services</i>).</p> <p>It is HBL responsibility to maintain records of all works having been carried out and the client is informed of his duty to maintain copies of all reports, surveys and test results issued for a period of 5 Years.</p>
<b>6</b>	<b>Reviews</b>
	<p>HBL do not offer a Routine Monitoring service and only provide standalone installation Cleaning and Disinfection Services, therefore formal reviews are not required. Any Service Agreements issued will reflect this.</p> <p>Outcomes from the completion of Agreements will be recorded and kept within Contract specific folders and any actions required and agreed being carried out in compliance with HBL Company Procedures (<i>HBL352 – Water Treatment Services</i>).</p>
<b>7</b>	<b>Internal Auditing</b>
	<p>Internal Audits of work procedures and compliance of each of the LCA Service Provider Commitments are carried out annually, with a formal record of all findings being kept (<i>HBL 351 - Internal Audit Record document</i>) and filed for reference/action within the dedicated electronic Legionella folder.</p> <p>The Audit will review internal company procedures in terms of compliance and to ensure that company procedures are being adhered to. Any non-conformances will be recorded and remedial actions put in place to address issues identified. The Audit will be carried in compliance with HBL Company Procedures (<i>HBL353 – Internal Audit Procedure</i>)</p>
<b>8</b>	<b>Sub-Contractors</b>
	<p>Where it is necessary, works will be sub-contracted out to other Service Providers with this being done in accordance with Company Policies and Procedures and only to those Contractors who are able to verify they are either LCA registered members or have</p>

	<p>systems that conform to the LCA’s Code of Conduct as a minimum, will be used.</p> <p>All Sub-Contractors are subject to an assessment process (HBL354 -<i>Sub-Contract Evaluation Form – Water Services</i>) prior to being approved for carrying out works on HBL behalf. This Assessment process includes establishing whether they are LCA Registered and confirmation of their LCA Certificate if they are. Where the Sub-Contractor is not LCA Registered they will asked to confirm membership of any trade associations, verification of personnel competence, quality control systems in place, and on site verification of works executed.</p> <p>As part of the Sub-Contract Assessment, the supplier will be asked to confirm Laboratory UKAS Registration for the facilities that they propose to use for the analysis of Water Sampling.</p> <p>The use of Sub-Contractors is subject to the annual audit (<i>HBL353 – Internal Audit Procedure</i>) which includes verification of operations (<i>HBL354 – Sub-Contract Evaluation Form – Water Services</i>).</p>
<p><b>9</b></p>	<p><b>Distribution of the Code</b></p>
	<p>HBL issue a copy of the current version of the LCA Code of Conduct and our Registration Certificate to all clients at the time of conclusion of new or renewed Service Agreements. A copy of the Code of Conduct and Registration Certificate will be incorporated within all submitted quotation (<i>HBL125 – Service Agreement Template – Water Services</i>) (<i>HBL352 – Water Treatment Services</i>).</p> <p>A copy of the HBL Certificate of Registration and Code of Conduct are available online through the Hatrick Bruce Ltd website, made available as pdf downloads and there is an associated link to the LCA website. These online documents are referenced within all quotations and Service Agreements.</p> <p>Up to date copies of the code of conduct and certification will be supplied to clients by operatives as part of site visits and will have information on how to access copies of the company Registration Certificate and Code of Conduct document via the Hatrick Bruce Ltd website.</p>