

Integrated System Procedures

Legionella Control Association Statement of Compliance



HBE | UK

Procedure No: IP-028

Rev No: 1

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Amendments

Revision No:	Nature of Change:	Issue Date:	Issued By:
1	Creation of document	01/11/2024	Ashleigh Greeves

The services offered by HBE UK under the scope of this code of conduct are limited to:

1. Risk Assessment Services
2. Water Treatment Services
3. Hot and Cold-Water Monitoring and Inspection Services
4. Cleaning and Disinfection Services
5. Independent Consultancy Services
6. Training Services
7. Legionella Analytical Services
8. Plant and Equipment Services

HBE's statement of compliance will be reviewed annually.

1. ALLOCATION OF RESPONSIBILITIES

1.1 HBE UK explains in detail the client's obligations under the Legionellosis Legislation i.e.

NI Legislation

- Health & Safety at Work Order (NI) 1978 (as amended 2000)
- Management of Health & Safety at Work Regulations (NI) 2000 as amended 2003 & 2006
- Control of Substances Hazardous to Health Regulations (NI) 2003 as amended 2005
- Health and Social Care Act 2012
- CIBSE TM13 – Minimising the risk of Legionnaires' Disease
- HSE document L8 (Fourth edition) – Legionnaires Disease, The control of legionella bacteria in water systems: Approved Code of Practice and Guidance on Regulations.
- HSE document HSG274 Part 1 - The control of legionella bacteria in evaporative cooling systems.
- HSE document HSG274 Part 2 - The control of legionella bacteria in hot and cold-water systems.
- HSE document HSG274 Part 3 - The control of legionella bacteria in other risk systems.
- Health Technical Memorandum 04-01: Safe water in healthcare premises (Part A, B & C)
- BS8558:2015 - Design, Installation, Testing & Maintenance of services supplying water for domestic Use within buildings and their curtilages.
- BS PD855468:2015 - Guide to Flushing Disinfection of Services for Domestic Use Within Buildings
- UK HSG220 – Health and Safety in Care Homes
- UK HSG282 - 2017 The control of legionella and other infectious agents in spa-pool systems
- BS 8580-1:2019 - Water quality – Risk assessments for Legionella control – Code of practice
- BS 8580-2:2022 - Water quality – Risk assessments for Pseudomonas Aeruginosa and other water borne pathogens – Code of practice
- BS 7592: 2022 – Sampling for Legionella Bacteria in Water Systems – Code of Practice

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ROI Legislation

- Safety, Health and Welfare at Work Act 2005 (No. 10 of 2005)
- Safety, Health and Welfare at Work (General Application) Regulations, 2007 (S.I. No. 299 of 2007)
- Safety, Health and Welfare at Work (Biological Agents) Regulations 2013 (S.I. No. 572 of 2013)
- Safety, Health and Welfare at Work (Chemical Agents) Regulations 2001, as amended in 1998 (S.I. No. 619 of 2001)
- Safety, Health and Welfare at Work (Reporting of Accidents and Dangerous Occurrences) Regulations 20 Statutory Instrument (S.I.) No. 370 of 2016
- National Guidelines for the Control of Legionellosis in Ireland, 2009
- Guidelines for the Prevention and Control of Infection from Water Systems in Healthcare Facilities, Published by Health Protection Surveillance Centre (HPSC), 2015.
- HSE document HSG274 Part 1 - The control of legionella bacteria in evaporative cooling systems.
- HSE document HSG274 Part 2 - The control of legionella bacteria in hot and cold-water systems.
- HSE document HSG274 Part 3 - The control of legionella bacteria in other risk systems.
- BS 8580-1:2019 - Water quality – Risk assessments for Legionella control – Code of practice
- BS 8580-2:2022 - Water quality – Risk assessments for Pseudomonas Aeruginosa and other water borne pathogens – Code of practice
- BS 7592: 2022 – Sampling for Legionella Bacteria in Water Systems – Code of Practice

UK Legislation

- Health & Safety at Work etc. Act 1974
- The Management of Health & Safety at Work Regulations 1999 as amended 2003 & 2006
- The Control of Substances Hazardous to Health Regulations 2002 as amended 2003 & 2004
- Health and Social Care Act 2012
- CIBSE TM13 – Minimising the risk of Legionnaires' Disease
- HSE document L8 (Fourth edition) – Legionnaires Disease, The control of legionella bacteria in water systems: Approved Code of Practice and Guidance on Regulations.
- HSE document HSG274 Part 1 - The control of legionella bacteria in evaporative cooling systems.
- HSE document HSG274 Part 2 - The control of legionella bacteria in hot and cold-water systems.
- HSE document HSG274 Part 3 - The control of legionella bacteria in other risk systems.
- Health Technical Memorandum 04-01: Safe water in healthcare premises (Part A, B & C)
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- UK HSG282 - 2017 The control of legionella and other infectious agents in spa-pool systems
- BS 8580-1:2019 - Water quality – Risk assessments for Legionella control – Code of practice
- BS 8580-2:2022 - Water quality – Risk assessments for Pseudomonas Aeruginosa and other water borne pathogens – Code of practice
- BS 7592: 2022 – Sampling for Legionella Bacteria in Water Systems – Code of Practice

This is detailed in IP-024 Legionella Account Management. This procedure covers the handling of all enquiries received by the company, the preparation and submission of tenders and quotations, and the method of reviewing all orders, whether written or verbal, received by the company to ensure that all aspects of the estimating and tendering process are carried out in a controlled manner that maximises the company's chances of a successful appointment right through to the completed job. It also includes a

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brief description of the basis of legionella infection, discussion of the ACOP L8 and HSG 274 and the Client's responsibility with respect to the ACOP.

1.2 HBE UK will identify those services covered by HBE UK contract and those which will be provided by the client, to meet all current obligations as detailed in IP-024 Legionella Account Management and the associated Legionella Quotation Templates.

- HBE UK Contract Review & Legionella Pre-Work Survey Document,
- HBE UK Legionella Management Quotation,
- HBE UK Legionella Risk Assessment Quotation,
- HBE UK Legionella Remedial Quotation,
- HBE UK Legionella Clean & Disinfection Quotation,

The quotations will be submitted to the client after agreement from them as to which services they would like HBE UK to provide (HBE UK will discuss what is required to comply with legislation applicable to the country and specific region), it will list the services that HBE UK will cover under the contract and those that the client will be responsible for, this will form part of the formal agreement.

HBE UK has a formal written agreement using the Legionella quotation templates listed above which are part of the account management system, this formal agreement with the client details the respective responsibilities for each requirement. The client receives a copy, authorises and returns a copy to acknowledge agreement. This is for all services provided by HBE UK under the scope of this code of conduct.

2. TRAINING AND COMPETENCE

2.1 HBE UK is certified to ISO 9001:2015 for Quality Management. Initial training needs are identified using IP-007, Section 5 and a training program arranged with an experienced Technician. This requires all staff to have a formal training program which includes Legionella Training (IF-161) containing individual training records all of which refer to the Code of Conduct and are annually reviewed by the Account Manager; this training is detailed in the Procedure – Legionella Training Awareness and Competence (IP-007). This provides an opportunity to highlight any training requirements which are discussed as part of the management meetings.

2.2 HBE UK has a legionella competence audit (IF-169 Legionella Surveyor Audit Form and IF-097 Legionella Technician Audit Form). There is a system in place to assess the competence of all Legionella Personnel annually. This information and competency are saved onto the operators' training file and any actions / findings logged in the Legionella Training (IF-161). The audit will be passed to the HSQE Team who will record trends, causes as necessary and determine any actions required. For new staff there will be a period of shadowing with experienced personnel, Technician training matrix will be completed as detailed in the Procedure – Legionella Training Awareness and Competence (IP-007). HBE UK organise Toolbox Talks with all personnel to ensure that they are kept up to date with current best practice procedures. Toolbox Talks are conducted by the Account Managers.

2.3 Training information and competency are saved onto the operators' training file and any actions / findings logged in the Legionella Training (IF-161) as detailed in Procedure – IP-007 Legionella

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Training Awareness and Competence. The audit will be passed to the HSQE Team who will record trends, causes as necessary and determine any actions required.

- 2.4 HBE UK conducts Toolbox Talks with all personnel this ensures that they are kept up to date with current best practice procedures. Training is scheduled to staff when there is any new guidance i.e. BS 8580-2:2022 - Water quality – Risk assessments for Pseudomonas aeruginosa and other water borne pathogens – Code of practice, or changes to the current Legislation, Industry Standards and good practice i.e., ACOP L8 and HSG 274 Part 1, 2 and 3, HPSC national guidelines for the control of legionellosis in Ireland, as stated in IP-007 and documented to Legionella Training (IF-161).

3. CONTROL MEASURES

- 3.1 HBE UK is a member of the Legionella Control Association, and is registered under the following services categories:

1. Legionella Risk Assessment Services
 - 1.1 Hot and Cold Water Systems
 - 1.2 Evaporative Cooling Systems
 - 1.3 Process and Other Systems
 - 1.4 Healthcare Risk assessment
3. Hot and Cold Water Monitoring and Inspection Services
4. Cleaning and Disinfection Services
5. Independent Consultancy Services
6. Training Services
7. Legionella Analytical Services
 - 7.1 Sampling
 - 7.2 Laboratory Analysis
 - 7.3 Interpretation of Analysis

Please refer to www.hbeuk.com for a copy of our Legionella Statement of Compliance and Legionella Control Association Certificate of Registration. In line with our Statement of Compliance IP-028, a copy of all records and reports generated by the client must be kept by the client for a period of 5 years. HBE UK will retain a copy of all HBE UK generated reports for 5 years also. This information will be confirmed within HBE UK's quotation documentation issued to the client.

If any samples are taken, they will be sent to a UKAS accredited ISO 17025 laboratory for analysis.

- 3.2 HBE UK have a management system in place to assess the requirements of their clients and any training needs to ensure an appropriate program of control measures is designed, implemented, monitored and maintained as detailed in procedures IP-024 and IP-029 Legionella Control Measures, HBE UK base this program on the L8 standards.

The programme of control measures is achieved through an internal LCA audit carried out on IF-458 Internal Audit form completed by the Quality Manager ensuring compliance with the LCA standard for service delivery. All paperwork is held on the HSQE Drive.

- 3.3 Implementation of all Corrective Actions & Preventative Actions are verified through monitoring of internal audits and the associated HSQE register by the quality manager as stated within IP-014 Corrective & Preventative Action Procedure and IP-015 Internal Audits Procedure. As part of HBE

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UKISO 9001:2015 Management System all customer complaints/feedback, audit non - conformances are all trended and form part of the Management Review Meetings.

The client will complete a Legionella contract review and Pre-Work Survey (IF-459) which details the responsible person details (name, telephone number & email address), deputy responsible person details & duty holder details. HBE UK will communicate with the Client's nominated personnel by email in the event of any necessary actions as detailed in IP-034 Legionella Escalation Procedure. HBE UK monitor all legionella positive sample results through the selected and approved 17025 accredited lab.

- 3.4 HBE UK have Procedure IP-013 Inspection and calibration of test equipment which confirms the requirements for calibration and validation procedures to ensure that any testing equipment used in the field is operating correctly. This is for all services provided by HBE UK under the scope of this code of conduct.

4. COMMUNICATION

- 4.1 The client will complete a Legionella contract review and Pre-Work Survey (IF-459) which details the responsible person details (name, telephone number & email address), deputy responsible person details, duty holder details and emergency site contact details. HBE UK will communicate with the Client's nominated personnel by email in the event of any necessary actions as detailed in IP-034 Legionella Escalation Procedure.

- 4.2 HBE UK have a Legionella Escalation Procedure IP-034 and Reporting of Emergency Procedure IP-022 where system non-conformances from normal control limits or safe operation are identified. IP-034 and IP-022 detail how HBE UK will appropriately respond if any systems operating conditions deviate from the control criteria. IP-024 Legionella account management details all communication related to enquires, tenders and quotations.

- 4.3 A list of all Clients' nominated personnel along with their details is securely stored on the regional share drive folders (in individual Client folders when provided), and on the Hub System. Reference detailed on IP-024 Legionella Account Management Procedure for the management of data. At contract start the lines of communication will be uploaded to the Hub, the account manager will notify the client it is their responsibility to notify HBE UK of any organisational changes that affect the lines of communication. HBE UK will update the HUB with the new information. The lines of communication will be reviewed at least annually during the contract review.

If any significant matters affecting the control of legionellosis which are beyond the responsibilities of the contract are highlighted these are recorded on the Site Visit Report Sheets by the Technicians/ Consultants who will email the appropriate Account Manager who in turn will inform the client as detailed in IP-024 Legionella Account Management Procedure.

- 4.4 HBE UK have a Legionella Escalation Procedure IP-034 and Reporting of Emergency Procedure IP-022 which details how HBE UK will appropriately respond if any systems operating conditions deviate from the control criteria.

5. RECORD KEEPING

- 5.1 HBE UK have a Legionella Documentation Control & Records Control Procedure IP - 032 which details

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what records should be kept by HBE UK& the Client and also where they should be kept.

5.2 HBE's Legionella Documentation Control & Records Control Procedure IP-032 is communicated to the client through the formal agreement and the Legionella Quotation templates which will instruct the client to maintain all of their records for a period of 5 years and HBE UK will retain all of their records for 5 years. All Client legionella records will be held on HBEs software systems; MBR and Bluezone Manager.

5.3 HBE UK have a Legionella Documentation Control & Records Control Procedure IP-032 which details what records should be kept for 5 years and where they should be stored. Either hard copy or electronic copy will be held by both HBE UK and client for 5 years.

6. REVIEWS

6.1 HBE UK has a Legionella Review Program in place which allows both parties to formally review on a monthly / 3 monthly / 6 monthly / annual basis all aspects of the agreement covering system Management, control of legionellosis and to include assisting the customer to assess training needs and if requested advise how these can be met. The agenda for such a review is detailed in IF-459 Contract Review & Legionella Pre-Work Survey document.

HBE UK has a Legionella Risk Assessment Review Program in place which allows risk assessments to be reviewed as per the risk allocation on a relevant basis with all aspects of the agreement covering system Management and the control of legionellosis, the agenda for such a review is detailed in IP-030 Legionella Review Program Procedure.

6.2 During the contract review or risk assessment an assessment will be made to look at any training needs the client might require, and if requested how these can be met.

7. INTERNAL AUDITING

7.1 HBE UK conduct a self-audit (IF-458 LCA Internal Audit) to ensure compliance with the Code of Conduct on an annual basis by the Quality Internal Auditor as part of the HBE UK Quality System to ensuring compliance with the LCA Standard for Service Delivery. All paperwork is held on the HSQE Drive.

7.2 Further to the LCA Internal Audit completed per 7.1, Legionella Audits (Procedures & Onsite Audits) are scheduled on an annual basis on the Audit Schedule, the Quality Internal Auditor conducts the audits IP-015 Internal Audits and IP-014 Corrective & Preventative Action Procedure, the auditee will sign the audit form (IF-042 Internal Audit Report Form) to agree with any findings in the audit. If any non-conformances are raised this will be raised using the corrective action program, this ensures compliance with each of the Legionella Control Association Commitments, a record is saved in the Legionella Control Association Folder on the HBE UK HSQE Drive.

7.3 A corrective action program has been established as part of IF-458 LCA Internal Audit. Any non-conformances will be highlighted by the ISO 9001:2015 non-conformance system procedure IP-014 Non-conformances, Preventative Actions & Corrective Actions using IF-001 Non-conforming work investigation form, the auditee will complete the IF-001 Non-conforming work investigation form and HSQE Register, the auditee will work with the appropriate manager to ensure close out of the corrective action. The HSQE Manager's will monitor the corrective action register on a monthly basis to ensure a timely close out of all non-conformances, this ensures compliance with each of the Legionella Control Association Commitments, and a record is saved in the Legionella Control

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Association Folder on the HBE UKH: Drive (HSQE). The HSQE Manager / Deputy Quality Manager ensures that non-conformances are also discussed at the annual Management review meetings and at the Monthly Quality Meeting; all non-conformances are closed out in a timely manner.

7.4 Document control has been established and is conducted in accordance with IP-001 Control of documented information. HBE UK Quality system is accredited to ISO 9001.

8. SUBCONTRACTORS

8.1 HBE UK has a Management procedure IP-020 Subcontractors which ensures that any sub-contractor used by HBE UK holds an independent registration. HBE UK may use subcontractors for the installation of dosing and control equipment for silver copper ionisation and chlorine dioxide dosing, as well as UKAS accredited Laboratory Services, which although not included in the scope, support the accredited services. Legionella Monitoring including Clean & Disinfection of CWSTs may be sub-contracted to an LCA registered company when required. Suitable Method Statements to comply with LCA service delivery standards are requested.

8.2 HBE UK carry out additional controls on their subcontractors by having the subcontractor complete a contractor questionnaire on a 12 month basis and may conduct an onsite audit on the key/critical subcontractors as detailed in IP-020 Externally provided products and services, to ensure that all activities carried out by subcontractors are compliant with the Code of Conduct and any relevant legislation annually or where there is a reason to doubt the subcontractor's performance.

8.3 HBE UK carry out additional assessment where a non registered subcontractor cannot provide records of staff competency assessment for work being carried out. HBE UK will conduct a documented assessment of the subcontractor's capability to carry out the work and the competency of their staff who will carry out the work to ensure that all activities carried out by subcontractors are compliant with the Code of Conduct and any relevant legislation annually or where there is a reason to doubt the subcontractor's performance.

8.4 HBE UK include subcontractor activity in the evidence examined in internal audits under commitment 7 using IF-042 Internal Audit Report Form to ensure that all aspects (scoping, quotation and delivery) are compliant with the LCA Code of Conduct and Service Delivery standards. Internal Audits will follow Procedure IP-015 Internal Audits.

9. PROMOTION AWARENESS OF THE LCA

9.1 HBE UK distribute any new or updated registration certificates and/or Code of Conduct to all clients via the HBE UK quotation templates and www.hbeuk.com website as detailed in IP-032 Legionella Document & Record Control. A copy of the registration certificate is also attached to each legionella risk assessment report.

9.2 HBE UK also distribute this information to their employees via email and upload to employee tablets. This information is also stored on the company SharePoint page Legionella tab & One Drive

9.3 Confirmation of membership and a copy of the code of conduct is available via a hyperlink to the LCA website available via www.hbeuk.com