

**THE SWIFTCLEAN GROUP  
POLICY STATEMENT ON COMPLIANCE WITH THE LEGIONELLA CONTROL  
ASSOCIATION FOR SERVICE PROVIDERS FOR THE CONTROL OF LEGIONELLA**

This statement covers the following scope of legionella control services that are offered  
by the Swiftclean Group

- LEGIONELLA RISK ASSESSMENT
- HOT & COLD WATER SYSTEM MONITORING
- TRAINING INDIVIDUALS TO CARRY OUT MONITORING
- CLEANING & DISINFECTION OF WATER SYSTEMS & PIPEWORK
- LEGIONELLA ANALYTICAL SERVICES

## **1) ALLOCATION OF RESPONSIBILITIES**

- a) Swiftclean provide a detailed service proposal (SP) to its customers. The SP details the plant and equipment applicable to the contract, the scope of works to be provided and the cost for doing so. This is done by issuing one of four document options PT001, PT009 (which are both used in conjunction with F232 – ‘Legionella Control Asset Questionnaire’ to obtain the asset information from the client to aid with the quoting procedure), PT008, PT009 and PT010. PT001 is used for ongoing Legionella monitoring works which includes details of the respective responsible duties of both Swiftclean and its customers (in relation to the proposed contracted works). Instruction I005 sets out the specific procedure for allocation of responsibilities in relation to ongoing Legionella Control contracts. PT009 is used for the Legionella Risk Assessment, PT008 for cold water tank remedials and PT010 for water system clean and disinfections.
- b) Swiftclean Technical Sales Consultants advise their customers of their general responsibilities associated with L8 (in relation to controlling Legionella) during routine sales calls and explain that L8 and accompanying guidance documents (HSG274 parts 1 – 3) gives practical advice on the requirements of the Health & Safety in relation to the Health and Safety at Work Act 1974, the Control of Substances Hazardous to Health (COSHH) Regulations and The Management of Health & Safety at Work Regulations. A web link is provided in the standard quotations to HSE documentation.
- c) In order to formalise any service agreement Swiftclean ensure that either; the customer signs the service proposal document or provides a purchase order referring to the service proposal. Swiftclean issue an order acknowledgement in all cases. For one-off works, or when any of the service proposals are not returned by the client, the quote, order and order acknowledgment (all of which are saved on the CRM system) are considered to be the formal agreement.
- d) Swiftclean confirm that they have LCA membership registration for the services quoted, on all quotation forms sent to the prospective or existing customer.

The procedure for formalisation of service agreements is covered in detail in Instruction I005.

## 2) TRAINING AND COMPETENCE OF PERSONNEL

- a) All appropriate Swiftclean staff receive training as detailed in the procedure in I054 (references to the Surveying Competencies & Training Schedule – F239).
- b) Swiftclean staff are required to attend and complete external training courses, which are City and Guilds accredited, in relevance to the Legionella control service they are responsible for delivering. On-the-job competency assessments are carried out annually as a minimum by the Compliance Technical Support Manager to further support the assessment process. Annual competency checks are conducted using forms T362, T363, T368 & T369
- c) Employees have their own training record kept on the “masters” ISO file within the training records file on the company computer data base.
- d) Staff are updated on new developments/best practice via meetings, internal memos and e-mails.
- e) Client staff training requirements are assessed during Legionella Risk Assessments and also as part of the Annual LCA Code of Conduct Legionella Management and Contract Review process (PT055). Further details are in procedure I054.

## 3) CONTROL MEASURES

- a) Current control measures within Swiftclean are limited to the treatment of hot and cold water systems. Instruction I006 details the control measures process.
- b) When carrying out disinfection, in accordance with either HSG274 Part 2 or BS 8558, chemical levels are monitored using an approved test method detailed in method statements ref: T375, and the procedure of carrying out the clean and disinfection is detailed in T093.
- c) Similar monitoring methods are employed during de-scaling operations as detailed in method statement ref: T315
- d) The method statements referred to above form the formal process that the Compliance Teams follow when conducting the physical works on site.
- e) Swiftclean shall maintain an electronic record of all planned and completed site visits, including Legionella monitoring, Legionella Risk Assessment and cleaning / chlorination work. This electronic diary of works will monitor that visits are undertaken as planned and on schedule (Ref: Surveyor Program Sheet *specific to year*).
- f)
  - i) The Service Delivery Coordinator (SDC), will use the electronic diary of works (Program Sheet), to manage the up and coming planned water services. The works are allocated to the Compliance Surveyor with the use of either Aquadept or Geopal (digital compliance software's) – the jobs are allocated onto the Compliance Surveyor's dedicated android smart phone.

- ii) Both Geopal and Aquadept managed jobs are reviewed on a daily basis and the job report is produced by the Surveying Administrator (including noting any problems and remedial actions required), and uploaded onto our customer online portal. A notification email is sent to the client, to advise that their report is available to download and they are informed of any out of parameter findings. It is the client's responsibility to ensure this is kept within either an on-site Legionella Control Log Book, or an electronic system which can be easily accessed.
- iii) The appropriate process is taken, for any temperatures out of parameter (P031) or Legionella Positive sample results (P018), which have been highlighted through either the Aquadept or Geopal software. These procedures allow for escalation to the responsible person, duty holder and if required the regulator.
- iv) Compliance to the LCA standards is checked via the internal audit process using the process detailed in I089 and form F047.

#### **4) COMMUNICATION & MANAGEMENT**

- a) Swiftclean operates their business using an electronic customer relationship management (CRM) system (ProspectSoft). This system is used to electronically record all communication with the customers of Swiftclean and is used as an internal tool for office based and remote Technical Sales Consultants to communicate amongst each other regarding customer contracts. The "recall" of a lead to an individual within Swiftclean ensures that they are aware of any responsibility for action.
- b) All defects identified as a Legionella 'problem lead' in the Swiftclean CRM system are reported to the customer main point of contact that is allocated against the main contract lead, by telephone, email, or letter.
- c) In the event of positive Legionella results, actions detailed in the Legionella positive procedure flow chart P018 are initiated. Actions, as detailed in HSG 274 Part 2 regarding specific Legionella counts, are recommended customer main point of contact that is allocated against the main contract lead, as part of this procedure.
- d) A weekly checking of "Legionella Alert Problems" & repeating "Temperatures out of parameter" problems created in Prospectsoft CRM system is carried out by the Compliance Technical Support Manager, to review any necessary actions which have not been progressed. In the event of serious defects not being rectified, this is escalated to the Surveying Services Manager via the CRM recall system.
- e) Swiftclean Surveyors conducting Legionella Risk Assessments communicate their findings via a Legionella Risk Assessment report which includes any recommended remedial actions/control measures.

Compliance Engineers conducting remedial works on hot and cold water services provide pre and post photographic evidence, via the DCS (GeoPal) system, for the works carried out. This is used to communicate with the clients' main point of contact (as per attached to the main contract lead) any actions complete.

- f) In the event of any Swiftclean staff discovering any defects which may increase the risk of Legionella outside the scope of any particular contract, the customer is informed

verbally and, where appropriate, will be detailed on the Geopal or Aquadept system (which is made available to the client). Where necessary, the Technical Sale Consultant will be informed to progress with the client, if additional services are required to ensure compliance is met.

- g) The chain of responsibility, both for the client and for Swiftclean is obtained by the relevant Technical Sales Consultant via a telephone or email exchange with the client after a purchase order has been received. When the primary and secondary contact have been determined working on behalf of the client, as recorded in PT001 (with up-to date details of all those in the contact chain) and is saved on the CRM system under the lead. Instruction I015 describes the company communication and management process in full.

## 5) **RECORD KEEPING**

- a) Each contract is recorded as a 'lead' along with digital copies of correspondence on the Swiftclean CRM system and issued with a unique job number and a file kept in the Surveying or Service Delivery office including all documentation and records specific to that particular contract. These records are kept for a minimum of five years after contract completion.
- b) Customers are given access to the online Swiftclean customer portal. A client specific login and password is emailed to the client and copies of service proposals, order acknowledgements, work completion reports, laboratory analysis reports, remedial action recommendations are uploaded to the database. They are advised that any printed records are held by the customer's responsible person in a designated location for a minimum of five years after contract completion. The Surveying Administrator will ensure that all service documents are kept up to date on the customer portal. The client's responsible person is responsible for maintaining the paper copies on a given site.
- c) Procedure I108 describes how record keeping is undertaken within the company.

## 6) **REVIEWS**

- a) The Compliance Technical Support Manager is responsible for conducting annual audited reviews with their active contracted customer base using the Swiftclean Annual LCA Code of Conduct Legionella Management and Contract Review process form PT055. The reviews are scheduled into the Surveying Programme.
- b) If the client wishes to discuss or add any items to the contract then the Technical Sales Consultants assists if fulfilling this request. The Compliance Technical Support Manager will provide assistance for any technical enquiries.
- c) During the review the client requirements for training of staff is discussed and where possible the Technical Sales Consultant provides costs to fulfil such training needs, following identification from the Compliance Technical Support Manager
- d) Upon completion of the review, a written summary with recommendations will be provided, and is emailed direct to the client as well as being saved on the CRM system.

- e) Instruction I012 describes the formal review process adopted by Swiftclean.

## 7) **INTERNAL AUDITING**

- a) An annual internal audit will take place to confirm compliance or otherwise with the first 9 requirements of the LCA. The audit involves the checking of customer records on the CRM system, as well as Swiftclean internal documentation to ensure that the correct procedures and documentation have been used. The results are recorded on form F047, and this will include any actions required, allocation of responsibilities for such actions and a completion date.
- b) The annual audit will be used to ensure that the programme of control measures satisfies as a minimum the LCA Standards for Service Delivery
- c) Instruction I089 describes the internal review process adopted by Swiftclean.

## 8) **SUB-CONTRACTORS**

- a) If sub-contractors were to be utilised, they would be reviewed and approved using I097.
- b) If Swiftclean use sub-contractors for any Legionella control works then ideally they should hold an independent accreditation with the LCA for that particular scope of work. If this is not possible, then Swiftclean ensure competency audits and LCA service standard checklists are carried out prior to taking the subcontractor on board.
- c) All laboratories used by Swiftclean are UKAS accredited. An annual check is performed to ensure that this is still current.

## 9) **DISTRIBUTION OF THE CODE**

Swiftclean will advise clients of the company's LCA membership and the LCA's Code of Conduct through the service proposals (PT001, PT008, PT009, PT010) for works quoted for. This will be in the form of web links to Swiftclean's LCA membership certificate and to the LCA's website for the Code of Conduct for service providers.

- [LCA Certificate of Registration](#)
- [LCA recommended code of conduct for service providers](#)
- [Swiftclean Building Services Statement of Compliance](#)
- <http://www.hse.gov.uk/pubns/books/l8.htm>

Statement Approved by: Adam Tucker

Signature:



Position:

Compliance Technical Support Manager

Date:

09/05/2019