The Control of Legionellosis: Code of Conduct for Service Providers

Statement of Compliance: ALS Laboratories (UK) Limited, ALS Coventry

It is a requirement of LCA membership that Member Companies must have in place formal written procedures to cover their Legionella control activities and that these procedures are followed in practice and that records are kept. The formal written procedures are summarised in the "Statement of Compliance" (SoC) that explains how the Member complies with the Code of Conduct. The SoC is reviewed annually, updated as required.

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ALS Coventry offer leading solutions in a diverse range of Waters, Land and Waste waters analysis, providing scientific services in Microbiology and Chemistry . ALS Coventry are also able to offer a range of support services including Sampling, Scheduling, Field Services, equipment for hire, Key Account Management and Project Management to help our customers find a solutions package that meets their requirements. ALS Coventry is committed to delivering a reliable, consistent and quality service for our customers.

ALS Coventry is quality assured through UKAS, ISO 17025:2017 and ISO 14001 certification. ALS Coventry are also MCERTS accredited for chemical analysis and participate in a wide range of external proficiency schemes. ALS Coventry also comply with ISO 45001 for their Health and Safety Management.

1. ALLOCATION OF RESPONSIBILITIES

Legislative requirements for the control of Legionella put the responsibility for compliance clearly with the owner/ operator of water systems. This requirement is clearly indicated in our Sampling Terms & Conditions. Under the Health and Safety at Work etc Act 1974 and the Control of Substances Hazardous to Health Regulations as regards risks from Legionella, all owners and operators of such systems have a responsibility to ensure that Legionella risk is controlled and kept to an acceptable level. The HSE Approved Code of Practice and guidance on regulations (L8) stresses that whilst the actions needed to be undertaken to control the risk may be contracted to an external specialist, the owner/operator must take all reasonable care to ensure the competence of the LCA Member to carry out the work on his behalf. Further guidance for the control of Legionella can be found on the Health and Safety Executives websites which includes ACOP L8 & HSG274.
1.2

Acceptance of ALS Coventry's trading terms and conditions and acceptance of a quotation constitutes a formal agreement between ALS Coventry and the client. ALS Coventry's *Terms and Conditions for The Sale of Services* are available on request.

GOP 7.1A Review of Requests, Tenders and Contracts details the requirements of assessing opportunities, submission of bids and quotations and the maintenance of contract documents.

2. TRAINING AND COMPETENCE

2.1 Each member of staff undertakes a structured training programme when they begin employment with ALS Coventry. For employees in the Microbiology laboratory this training is specific to their duties and is documented in ALS Coventry's MICRO OP 04 Training and Ongoing Monitoring of Competence and in the Group Procedure GOP 6.2AThis training covers the four key areas of Isolation, Identification, Colony Enumeration and Confirmation. All training is performed with reference to previous experience and qualifications. Administrative support and ancillary staff associated with the Microbiology Laboratory are also trained in the relevant areas.

Training is undertaken by designated trainers. The Microbiology Manager is responsible for ensuring consistency of standard and for training senior staff. Where new equipment or techniques are introduced, external training support is utilised such as from the manufacturer/supplier.

Sampling training is documented in Commercial Operating Procedures – Field Services – Procedure COM18

2.2 The competence of staff is also monitored by participation in the Health Protection Agencies and QWAS external quality assurance scheme for the analysis of Legionella. The results of these assessments are recorded in the PT spreadsheets. CPD records are also maintained where appropriate and the requirements are documented in GOP6.2A.

2.3 All training is documented in training records which are kept in the training file within the Microbiology department. It is the responsibility of the analyst being trained to ensure that their records are maintained and up to date. All relevant original raw data e.g. worksheets and supporting documents are included in the training record. The procedure for internal assessment of staff competence is documented in ALS Coventry operating *procedure Micro OP04: Training and Ongoing Monitoring of Competence.* This procedure is attached in the supporting evidence. For sampling, the training requirements are documented in procedure COM 18.

2.4 The Technical and Operational Managers keep abreast of New developments with relevant industry standards and guidance and this is communicated to relevant members of staff. Information is circulated by Technical Managers via Monthly Reports and Technical meetings and minutes are kept of these meetings. Section 5.2 of the Group Quality Manual documents the communication systems we have in place at ALS Coventry.

ALS Laboratories (UK) Limited do not currently provide any formal certificated training for external clients.

3. CONTROL MEASURES

3.1 ALS Coventry register annually for Legionella control services which we offer to our clients. These are recorded in the LCA registration document which is available on request. Details of our membership are in our quotation and website.
The LCA Statement of Compliance and service standards for service delivery is checked and reviewed annually against the LCA service standard checklist and documented in MICRO OP 05.

3.2 ALS Coventry have documented quality control procedures for monitoring the validity of the tests ALS Coventry undertaken. For Legionella analysis these procedures are documented in ALS Environmental Coventry's *Operating Procedure Micro OP05: Maintenance of the Quality Assurance, Microbiology*.

The procedure covers the following: -

a) Regular use of certified reference materials and/or internal analytical quality control using secondary reference materials.
b) Participation in interlaboratory comparison or proficiency testing schemes.
c) Replicate tests.
d) Retesting of retained items following e.g. customer queries or at analysts discretion.
e) Integrity checks - correlation of results for different characteristics of a sample.
f) The auditing of the Legionella Laboratory and sampling activity on a minimum of one occasion in any annual year.

3.3 This does not apply to a laboratory – ALS only supplies analytical results and no consultancy is undertaken to interpret sample results

3.4 ALS Coventry has group procedures that ensure the appropriate level of calibration (Quality Manual 6.4) and validation (GOP 7.2A & 7.2B & 7.2C) of equipment and analytical methods.

4. COMMUNICATION

4.1 Many customers require early warnings of positive Legionella results to allow action to be taken. Interim positive results are reported automatically through ALS Coventry's auto-notification system in .pdf format by email to customer nominated email addresses. All results are clear and accurate. All interim results reported prior to the final report are clearly shown to be presumptive /interim results. Contract details are gathered at contract and quote set up with relevant contact details. These are described in GOP 7.1A Review of Requests, Tenders and Contracts details the requirements of assessing opportunities, submission of bids and quotations and the maintenance of contract documents.

Reporting of Sample Results and Associated Information Prior to Final Report Being Issued is documented in ALS Coventry's Operating Procedure *Micro OP15*.

4.2 Customers are informed of any circumstances, such as delayed arrival of samples that could affect results. Comments relating to these circumstances are reported in a standard format as an analyst comment on the final report and also on order acknowledgement reports post registration of samples.

The final report issued by the reporting team is the final definitive and authorised result and can only be altered by the submission of appropriate changes forms by a senior member of staff.

Any positive Legionella results are reported as in section 4.1.

4.3 This does not apply to a laboratory – ALS only supplies analytical results and sampling services and no consultancy or review of Legionella Risk Assessments is undertaken.

4.4 ALS Coventry only have analysis and sampling for Legionella as an activity on the Areas of interest on the LCA re-registration form. This is because our expertise does not extend to Legionella consultancy or the reviewing and trending of clients results and thus having in place an escalation procedure where re occurrent failures arise from the same sampling points is not relevant. This is the responsibility of our clients who are mostly water treatment companies, facilities management and consultants. The role of ALS Coventry is to produce a UKAS accredited analytical test result.
Results are reported as documented in MICRO OP 15.

However, as detailed in section 4.1, all positive Legionella results are appropriately escalated to the relevant client contacts in good time. This complies with the LCAs requirements to "**Have a formal staged escalation procedure to ensure that in the event of significant matters of concern that must be raised, these are escalated, as necessary, to the responsible person, the duty holder and, as a last resort, to the relevant enforcement agency" ALS does not have an escalation procedure as an "enforcement process" to the LCA as we only report results. We advise customers of results but we don't trend the results.**

5. RECORD KEEPING

5.1 The laboratory has documented procedures for the identification, collection, indexing, access, storage, maintenance and disposal of quality and technical records (*ALS Coventry Operating Procedure GOP.8.4A Control of Records*)
The quality records such as internal audit reports and management reviews are under the control of the relevant Site Quality Manager. Records of corrective and preventive actions, raw data and technical records are under the control of the Technical Management. The records may be as hard copy or held electronically.

All records are legible and are maintained in secure and environmentally suitable conditions either as hard copy, computer disk or any other acceptable method for a minimum period of five years, or as defined in the customer's specifications, or regulatory authority whichever is longer. The ALS Quotation details the requirements for clients and ALS for keeping Legionella records and the number of years that records are required to be kept.

All records are regarded as confidential and are held securely.

There are documented procedures for protection and back-up of electronically stored records *(ALS Coventry Group procedures GOP 8.4D Electronic backup procedure).* These records are password protected to prevent unauthorised access or amendment.

ALS have a web portal for managing data results and reports online. This web portal is called myALS.

The Guidance notes for using myALS and customer introduction for myALS web portals are very clearly presented on the ALS website at the locations below:

Introduction to myALS

https://www.alsenvironmental.co.uk/customer-services/myals

Guidance notes to use myALS

https://www.alsenvironmental.co.uk/about-us/news/Guidance-Notes-for-myALS_1066

5.2 GOP 8.4A, a Group procedure, states that all quality records are kept for 5 years. The ALS Quotation details the requirements for clients and ALS for keeping Legionella records and the number of years that records are required to be kept.

5.3 GOP 8.4A, a Group procedure, states that all quality records are kept for 5 years. All records are available for audit as and when required by service users.

6. REVIEWS

Customer reviews are carried out where we have contractual arrangement but this is related to laboratory service levels and not associated with Legionella control.

7. INTERNAL AUDITING

7.1
Procedure MICRO OP 05 details the requirement to annually audit against the LCA Code of Conduct and the LCA service standard for the delivery of legionella sampling and testing services. This is documented on audit checklist CQF1220. Audit Schedules and Progress are captured in the ALS Coventry Quality Management System. ALS Group procedure GOP 8.8A documents the process to follow. A competent auditor is nominated for individual audits and will prepare, conduct and report the audit according to the documented procedure."

7.2 The internal audit programme for the site covers all elements of the management system, including analytical activity. The audit schedule is such that each aspect of the management system for internal auditing is normally completed in one year. A defined rolling programme ensures that each test method is audited within a documented period. The Legionella method is audited annually. Audits will be method witness, vertical audit and spot audits. Legionella LCA internal audit is referenced in Coventry's *Operating Procedure Micro OP05: Maintenance of the Quality Assurance, Microbiology*.

7.3 Where an audit indicates a non-conformance or a number of non-conformances which cast doubt on the effectiveness of the operations or on the correctness or validity of the laboratory's test results, the Technical Management will take corrective action in a timely manner. The Quality Manager and Operations Manager will be consulted and if necessary, the customers shall be notified in writing, if investigations

show that the laboratory results have been affected. There are documented procedures for conducting the audit, recording its findings and any corrective actions required.
Follow-up audit activities are conducted and documented to verify the implementation of any corrective action in the agreed timescale. An assessment is also made as to the effectiveness of any action. Group procedure GOP 8.8A describes the internal audit process including the investigation of any non-conforming work.

8. SUBCONTRACTORS

8.1 – 8.4 Where the laboratory needs to sub-contract analytical work whether due to unforeseen reasons or a lack of current capability or expertise, the ALS Coventry will sub-contracted to a competent organisation. The competent sub-contractor will be one that complies with the standard ISO 17025,
is accredited by a national body or has been audited by ALS Coventry to ISO 17025 standard or is an established and acceptable supplier. We would only subcontract to a UKAS accredited laboratory for legionella analysis. ALS Group procedure GOP 6.6H for the subcontracting of tests outlines the procedure.

Subcontracting is not applicable to sampling services for Legionella.

9. PROMOTING AWARENESS OF THE LCA

9.1 A reference to the LCA Code of Conduct and LCA membership is present on the ALS quotation such that these are visible to all customers. A copy of the registration certificate will be provided when requested by specific customers. ALS Coventry Code of Conduct statement is available as a downloadable document on our website. MICRO OP 05 describes the promotion of the LCA.

Revision History

Version	Date	Author	Comments
2009	12/01/2009	Carla Hall	No version control
2010	2010	Pervinder Johal	Added requirement for 2 audits of Legionella lab
1.0	21/03/2012	Pervinder Johal	Changed STL to STS Updated procedure nomenclature Version control and Revision History added Page numbers added
1.1	6/3/2013	Pervinder Johal	Changed reference to STS AS to ALS Environmental Ltd Coventry
1.2	11/7/2014	Pervinder Johal	Reviewed July 2014
1.3	8/7/2015	Pervinder Johal	Reviewed July 2015
1.4	6/7/2016	Pervinder Johal	Reviewed July 2016
1.5	10/7/2017	Pervinder Johal	Reviewed July 2017
1.6	10/7/2018	Pervinder Johal	Reviewed August 2018
1.7	19/12/2018	Pervinder Johal	Reviewed December 2018, LCA audit improvement actions; section 4 and 5.
1.8	08/08/2019	Pervinder Johal	Reviewed 8th August, including additional detail in section 4 regards escalation process.
1.9	27/11/19	Pervinder Johal	Reviewed November following LCA audit Oct 2019
1.20	4/9/20	Pervinder Johal	Reviewed September 2020; remove reference to ISO9001; add reference to ISO 45001, QWAS EQA; Add reference for sampling training procedure
1.30	5/10/21	Pervinder Johal	Reviewed due to updates in the new LCA Code of Conduct

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1.40	24/12/21	Pervinder Johal	Updated following LCA Audit November 2021
1.50	4/10/22	Pervinder Johal	ALS Environmental Ltd legal entity name change from ALS Environmental Ltd to ALS Laboratories (UK) Limited