



## Legionella Control Association

### MCP Environmental Ltd – Statement of Compliance

#### **Introduction**

MCP Environmental are providers of high quality legionella risk assessment. This service is offered for the following types of systems:

- Hot and Cold Water Systems
- Process and Other Systems.

This service is supplied across the UK.

#### **Allocation of Responsibility**

1.1 MCP Environmental is committed to explain to the client their responsibilities under the current legislation & guidance, this includes the Health and Safety at Work Act 1974, The Control of Substances Hazardous to Health Regulations 2002, The Management of Health and Safety at Work Regulations 1999, Approved Code of Practice L8, HSG274 parts 2 & 3, Health Technical Memorandum (HTM)04-01& 01-05. This is confirmed during consultation with the client to ensure their needs are met and the scope of work required is accurate and fit for purpose. This is then formalised within final quotation submitted to the client.

#### [MCP-LEG-FL001 Issue 4 Legionella Risk Assessment Process](#)

1.2 MCP Environmental representatives will conduct a preliminary inspection of a client's premises where possible, alternatively, if it is not possible to survey the site will use form [MCP-LEG-F001 Client Project Requirements](#). MCP Environmental will gather sufficient information from the client via e mail/telephone calls to allow them to determine the scope of legionella risk assessment required and undertake the works as per their client's specification. This is communicated via the final quotation document.

Included within the final quotation is a statement (where appropriate) defining those services to be provided by MCP Environmental and those to be supplied by the client. If further control measures are required under current legislation and guidance, and do not form part of the service provided; MCP will clarify to the client its obligation and the need for further action to be taken to achieve compliance. This will form part of the final quotation document as an exemption.

#### [MCP-LEG-FL001 Issue 4 Legionella Risk Assessment Process](#)

1.3 When the client enters a formal service agreement with MCP Environmental they are issued with a formal quotation denoting the exact requirement and level of service to be provided. Works will be undertaken following formal authorisation from the client, which may be in the form of written correspondence (i.e. return of a completed quotation document) with a formal works order. No deviation from the agreement will take place without express consent or

authorisation from the client. Where additional cost may be incurred, a quotation is re-issued and agreed formally before any supplementary work is undertaken.

[MCP-LEG-FL001 Issue 4 Legionella Risk Assessment Process](#)

1.4 MCP Environmental are proud to hold LCA membership. This membership is communicated to the client within the formal quotation and is available for view on the company website.

[MCP-LEG-FL001 Issue 4 Legionella Risk Assessment Process](#)

### **Training & Competence of Personnel**

2.1 MCP Environmental are committed to the continued training investment in our team. While fulfilling the minimum training requirements for each member of staff MCP aspire to provide greater training and progression. Our team members are actively encouraged to expand their skills. Our training procedure regarding the control of legionella is based on the LCA guidelines. The Directors manage the training for all employees, but this is delegated to the technical and SHEQ team to implement.

[MCP-LEG-FL001 Issue 4 Legionella Risk Assessment Process](#)

2.2 In order to ensure the quality of our services employees involved in the legionella risk assessments are refreshed in their training and undertake at least one audit per discipline over each 12 month period. Audits are conducted by experienced & qualified MCP Environmental legionella technical team members using the [MCP-LEG-F003 Form](#) which assesses set skill areas and highlights any areas for any further training. The outcome of this assessment is then recorded with [MCP-LEG-T004](#).

In addition, all members of staff are assessed via Competency Assessment. Based on the LCA skills matrix, this assessment highlights training needs required. No member of staff may be involved in active work without sufficient competence.

[MCP-LEG-FL001 Issue 4 Legionella Risk Assessment Process](#)

All MCP Environmental staff are regularly re-trained to current best practice standards via team meetings and specific training sessions as deemed appropriate. Further information is gathered from sources such as the HSE alerts, HSE website, WMSoc publication Waterline and other professional memberships. External consultants may also be consulted to keep abreast of current developments.

[MCP-LEG-FL001 Issue 4 Legionella Risk Assessment Process](#)

2.3 MCP Environmental assess the training needs of the client's personnel as part of the comprehensive legionella risk assessment process and recommend any training needs within the final risk assessment report. Upon request, MCP may recommend trusted training organisations to fulfil the client requirement.

### **Control Measures**

3.1 All risk assessment activities are conducted in compliance with [MCP-LEG-FL001 Issue 4 Legionella Risk Assessment Process and are based on BS 8580](#).

All personnel conducting work activities are audited via the staff competency assessment procedure on a regular basis to ensure continued compliance.

Once an order is received, the work is scheduled by the Administration Team using an electronic diary directly to the risk assessor's tablets, and the work is tracked using the in house management system. The Legionella Technical Manager will issue site specific risk and method statements for the works. The client is then consulted, and a mutually acceptable start date is agreed.

#### [MCP-LEG-FL001 Issue 4 Legionella Risk Assessment Process](#)

- 3.2 The MCP Environmental representative will complete the required works within the agreed scope of works and subsequently issues a completed legionella risk assessment report. The final report is quality checked by the Legionella Technical Manager or Technical administrator (with a P901 qualification), prior to issue to the client.

Where non-conformances are noted during internal audit procedures they are immediately addressed using form [MCP-LEG-F005](#).

This ensures all non-conformances are dealt with in a timely manner and their re-occurrence prevented.

Following completion and issue of the risk assessment report, MCP will confirm that the client is aware of the recommendations raised by the report and that the client understands how to proceed to achieve compliance. In addition, as an optional supplement (at a small additional cost) MCP may be employed to review that assessment once all actions have been completed to reassure the client that the process has been successful.

12 months following completion of any risk assessment MCP will contact the client to recommend a review of the risk assessment. This will ensure the client is aware of the need to regularly review the risk assessment to maintain compliance.

#### [MCP-LEG-FL001 Issue 4 Legionella Risk Assessment Process](#)

- 3.3 MCP are committed to compliance with the guidelines set out by LCA. In order to assure that the services provided by MCP Environmental meet the LCA service standards internal audit procedures are undertaken at regular intervals. This includes all areas of works MCP currently undertake.

At each internal audit a reference check is made of the LCA website to confirm MCP are aware and using the latest standard of service delivery for each area of interest performed by the company.

#### [MCP-LEG-P003 - Issue 1 - LCA Internal Audit Procedure](#)

### **Communication**

- 4.1 MCP Environmental will actively respond to site regarding non-conformances seen on site using the legionella risk assessment, if a significant risk is observed this is communicated directly to the client verbally while on site and subsequently followed up via e mail.

#### [MCP-LEG-FL001 Issue 4 Legionella Risk Assessment Process](#)

- 4.2 MCP Environmental agree a communication procedure with each client at the beginning of any contracted works. Formal lines of communication are always determined at the start of the contract by the MCP Environmental representative using form [MCP-LEG-F001](#) and the

data transferred to the new client files created by [MCP-LEG-T002 File Structure for New Clients](#).

#### [MCP-LEG-FL001 Issue 4 Legionella Risk Assessment Process](#)

4.3 In the event that MCP Environmental identify matters of concern that fall outside the scope of the contracted works, these are immediately communicated by MCP Environmental staff to the client both verbally, and in the form of a supplementary written correspondence.

#### [MCP-LEG-FL001 Issue 4 Legionella Risk Assessment Process](#)

### **Record Keeping**

5.1 MCP Environmental advises the client via the initial quotation that all records regarding the control of legionella should be maintained, and they should be kept in a secure location, typically a logbook, this maybe electronic.

MCP retain all data collected as part of the scope of works for a period of not less than 7 years.

#### [MCP-LEG-FL001 Issue 4 Legionella Risk Assessment Process](#)

5.2 MCP Environmental will advise the client via the initial quotation that the client is responsible for the maintenance of all records. MCP will provide to the client any information gathered during the risk assessment process to aid compliance where appropriate.

#### [MCP-LEG-FL001 Issue 4 Legionella Risk Assessment Process](#)

### **Reviews**

6.1 MCP Environmental will undertake regular review meeting with the client where appropriate during long term contracted works. This will be performed every 12 months or at any interval where information is gathered to support the benefit of additional review.

Following one-off assessment activities, the report notes a recommended 12 monthly review.

MCP will contact the client following a time lapse of 12 months to communicate the need to review the legionella risk assessment. The service will be also be offered at this time.

#### [MCP-LEG-FL001 Issue 4 Legionella Risk Assessment Process](#)

### **Internal Auditing**

7.1 The MCP Environmental compliance status with the LCA Code of Conduct is reviewed annually to ensure that the commitments are being fulfilled as intended. The audit is undertaken by the Legionella Technical Manager (or Deputy in his/her absence)-using form [MCP-LEG-F005](#). The auditor reviews a representative percentage of each client's files and MCP Environmental training records.

#### [MCP-LEG-P003 LCA Internal Audit Procedure](#)

7.2 MCP are committed to ensuring non conformances are corrected in an effective, timely manner. The MCP-LEG-F006 form contains a section detailing any areas of non-compliance, the corrective action to be taken it also details timescales and appointed

persons responsible for completing the action. Also, MCP Procedure 004 NCR & Complaints Procedure is used to confirm non-conformances are resolved.

[MCP-LEG-P003 LCA Internal Audit Procedure](#)

### **Sub-contractors**

8.1 MCP will not under any circumstances sub contract any work.

8.2 Not applicable

8.3 Not applicable

### **Distribution of the Code**

9.1 This is achieved via the initial quotation. MCP Environmental provide the client with a copy of the code of conduct and our LCA certificate and by reference to the MCP Environmental website. A copy of the LCA membership certificate is also supplied with the issued legionella risk assessment.

During regular internal audit MCP will check to ensure the latest version of the code of conduct is used.

[MCP-LEG-FL001 Issue 4 Legionella Risk Assessment Process](#)