

LCA Company Audit Report

Company Name: HFL Building Solutions

Registration Reference: 2017/3371

Date: 16/11/2017

Assessor: Paul Trematick

1. Allocation of responsibilities		
Scope	Activities on Areas of Interest Form	Does this agree with activities of company?
	Legionella Risk Assessment Services; Hot & Cold Water Monitoring & Inspection Services; Cleaning & Disinfection Services and Legionella Analytical Services.	Yes. HFL Building Solutions are a large FM company that subcontract out over £1 million Legionella Compliance work per annum. They are in the process of growing some of this work in house and have recently taken on-board Becky Quinn (Contract Support) and Mark Cummins (Hygiene Engineer) to the Compliance Division headed by Ryan Winn. They do not wish to treat cooling systems, only closed systems, and as such this does not fall under the LCA. The LCA Secretariat will therefore remove water treatment from the list of services on the LCA website.
Service Provider Commitments The service provider will:	Review of procedures for compliance Please note that items recorded in blue type are for your consideration whereas matters leading to an item recorded in red type are an agreed action point.	Evidence of compliance
1.1 explain in detail the client's obligations under the legionella legislation.	The procedure for setting up a new client (HFL-LCA-1.1) drives the issue of an advice note HFL-LCA-Appendix 1 detailing client obligations. You should take care not to confuse legislation and guidance. Legislation comprises the Act and the two Regulations. L8 references the legislation without itself being legislation. HSG274 is guidance only.	Quotation Template HFL-LCA-1.1 seen in place. All of the work gained to date is internally from HFL Business Solutions and as such no Quotations to direct Clients have been issued. NC 1 Please add HSG 282 to the list of Legionella Legislation within the SoC.
1.2 identify those services covered by the contract and those which should be provided by the client to meet all current obligations.	HFL-LCA-Appendix 2 incorporates a summary of all of the tasks required by L8.	HFL-LCA-1.1 Appendix 2 seen in place. Draft example of a Quotation also seen.
1.3 formalise a written agreement detailing the respective responsibilities for each requirement.	HFL-LCA-Appendix 2 incorporates a summary of all of the tasks required by L8.	HFL-LCA-1.1 Appendix 2 seen in place.
1.4 state in the written agreement that the service provider has LCA registration for the service categories being provided.	Both quotations and tender entries specify the service categories which HFL are registered with the Legionella Control Association.	Quotation Appendix 1 seen to comply.

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2. Training and competence of personnel

Service Provider Commitments	Review of procedures for compliance	Evidence of compliance
The service provider will:		
2.1 arrange formal training programmes for service provider personnel associated with the control of legionella bacteria.	Training procedure HFL-LCA-2.1 details the company procedure for producing a training program and recording each employee's current status on a matrix based on the LCA training guide. (Form HFL-LCA-Form 1)	HFL-LCA-2.1 seen in place. Form HFL-LCA-Form 1 seen to list Ryan Winn and Callum Baldwin having attained HABC levels 2 Legionella Awareness and Ryan Having HABC level 3 Responsible person training with Hydroviron.
2.2 have a system for assessing the competence of service provider staff, establishing their training needs and ensuring they are kept up to date with current best practice procedures.	Procedure HFL-LCA-2.1 details the requirement for a manager or supervisor to assess each employee's ability to follow service procedures (HFL-Method statements HFL01 to HFL11) using the LCA-HFL-Form 2, Competence Assessment form.	LCA-HFL-Form 2, Competence Assessment form seen in place for Callum Baldwin, at OGS Manchester. NC 2 Please add to form 2 the task that was assessed. And new one for Neil. Please note evidence of Competency checks being carried out in line with LCA Guidance: - https://www.legionellacontrol.org.uk/_data/pdf/competence-2041706-17.pdf
2.3 assist the client to assess training needs of staff and then where requested advise as to how these can be met.	Client training & competence needs are identified during, initial risk assessment works, at contract review.	HFL Compliance is the Department carrying out the Legionella compliance work for HFL Building Solutions Ltd. Yet it is HFL Building Solutions Ltd that is LCA registered. HFL Building Solutions Ltd needs to provide Responsible Person Training to the Area Managers that are in day to day contact with the end user. Furthermore those responsible for Tendering and Quotations regarding Legionella control works need to be trained so that they are competent and understand the full implications of the Legionella Legislation when pricing for works. NC 3 Please provide evidence that such training is planned.

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3. Control measures

Service Provider Commitments The service provider will:	Review of procedures for compliance	Evidence of compliance
3.1 have a management system to assess the requirements and ensure the appropriate programme of control measures is designed, implemented, monitored and maintained.	Written procedure for the control of service (HFL-LCA-3.1) describes the selection of control limits in-line with HSG274 Part 2, 3 and the HSG282 for the correct performance of our services.	HFL-LCA-3.1 seen in place. Compliance Log Sheets seen for:- 68 Sackville Street, where completed records of service visit seen carried out in compliance with the Contract. Record of C&D of Showers at 76 King Street seen in place together with Eurofins Legionella sample results. Salford Shopping Centre Monitoring of Temperatures 6/11/2017 and 23/10/2017. Remedial requirements reported back to Client by email satisfactorily.
3.2 have a system for verifying that corrective and preventive actions are implemented.	Written procedure for the control of service (HFL-LCA-3.1)	HFL-LCA-3.1 seen in place.
3.3 ensure the programme of control measures satisfies as a minimum the LCA Standards for Service Delivery.	This is maintained via our internal auditing process to ensure we exceed the LCAs standards for service delivery.	Blank I. A. form seen in place.

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4. Communication

Service Provider Commitments The service provider will:	Review of procedures for compliance	Evidence of compliance
4.1 have management procedures to respond appropriately should the system operating conditions deviate from control criteria.	HFL-LCA-4.1 Communication Positive legionella or high general microbiological results are identified, by external laboratory, they are communicated using "Action in the event of a Positive Result" procedure, LCA- 4.2, and based on Table 2.2 in HSG274 Part 2.	HFL-LCA-4.1 seen in place. Paper trail followed following positive legionella sample at OGS, Manchester 17/08/2017. Legionella Positive certificate received from ALS 01/09/2017. Emailed quotation seen to have been sent 01/09/2017 to Client advising of remedials to be carried out. HFL CS paperwork following remedial work and resample being carried out 02/09/2017. Clear sample report received and sent to client 16/09/2017. All satisfactory.
4.2 agree with the client how the service provider would communicate with the client's nominated personnel in the event of any necessary actions.	HFL-LCA-4.1 Communication	HFL-LCA-4.1 seen in place.
4.3 bring to the client's attention any significant matters affecting the control of legionella of which he has become aware, beyond the responsibilities of the contract.	Annual review form HFL-LCA-Form 3 used here.	Annual review form HFL-LCA-Form seen in place.

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5. Record keeping

Service Provider Commitments The service provider will:	Review of procedures for compliance	Evidence of compliance
5.1 indicate which records should be kept by both parties and where they will be kept.	LCA 5.1.	<p>LCA 5.1. seen in place. HFL CS records seen on shared drive (G or Maximo). L8MS is used for 4Viva contract which looks after C&W Housing Trust and Villages Housing. Upon examining a number of Contract Files it became clear to the Assessor that these Contract Files contained no Asset Registers, with respect to Legionella Control. Furthermore the Dilapidation and Condition Report Sheet does not include that HFL BS has asked if is there a Legionella Policy, Legionella Risk Assessment and Written scheme in place.</p> <p>NC 4 Please provide a modified Dilapidation Report Sheet which asks if there is a Legionella Policy, Legionella Risk Assessment and Written scheme in place.</p>
5.2 establish with the client who will be responsible for the maintenance of these records.	HFL-LCA-Appendix 2 details which record keeping responsibilities are contracted to HFL and which remain the clients responsibility.	<p>HFL-LCA-Appendix 2 seen earlier. NC 5 Please provide a copy of "Receipt of Log Book Letter" sent out to Client advising them of the need to Keep their records for 5 years.</p>

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6. Reviews

Service Provider Commitments	Review of procedures for compliance	Evidence of compliance
The service provider will:		
6.1 establish a programme that will allow both parties to review formally, at least annually, all aspects of the agreement covering system management and the control of legionella.	Procedure HFL-LCA-6.1. Review form HFL-LCA-Form 3, including customer feedback or agenda additions.	Procedure HFL-LCA-6.1 seen in place. HFL-LCA-Form 3 seen earlier.

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7. Internal Auditing

Service Provider Commitments	Review of procedures for compliance	Evidence of compliance
The service provider will:		
7.1 have a management system to ensure that Service Provider compliance with each of these commitments is self-audited at least once a year and that a formal record is kept.	Initial Internal Audit 02/05/2017.	Internal Audit 01/11/2017 carried out by Beki Quinn seen in place.
7.2 establish a corrective action programme so that any non-compliance identified is corrected in a timely manner.	The procedure calls for the use of corrective action forms (HFL-LCA-7.2) to formally record any found non-conformities and set agreed dates for corrective action to be completed.	No Non-conformances to report.

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8. Sub-contractors

Service Provider Commitments	Review of procedures for compliance	Evidence of compliance
The service provider will:		
8.1 have a management procedure to ensure that any sub-contractor holds an independent registration under the Code of Conduct; or	HFL – LCA 8.1 & 8.2	Both HFL – LCA 8.1 & 8.2 seen in place.
8.2 where a sub-contractor is not LCA registered, implement additional controls and audits to ensure that all activities carried out are compliant with the Code of Conduct and any relevant legislation; and	This is N/A as HFL only uses LCA registered sub-contractors.	GMS Ltd are used to provide Legionella Risk Assessments, a review will be carried out in December.
8.3 regardless of whether the sub-contractor is LCA registered or not, implement procedures and checks as necessary to ensure that the competency of the sub-contract service provider is assessed in relation to the scope of service the sub-contractor is providing.	HFL – LCA 8.1 & 8.2	

9. Distribution of the Code

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Service Provider Commitments The service provider will:	Review of procedures for compliance	Evidence of compliance
9.1 have a management system to ensure all clients to whom services are provided, associated with the control of legionella, receive a copy of the Code of Conduct and Certificate of Registration or are informed that the current documents are available on their website.	A copy of the LCA code and registration certificate is sent to each new client with the "Specific allocation of responsibilities" document HFL-LCA-Appendix 2. The allocation of the LCA code and HFL's LCA registration certificate are checked and noted as part of the customer / client review annually, (HFL-LCA-Form 3). Updated certificates will be issued every year to all existing clients by way of email distribution.	NC 6 Please add the Code of Conduct to the website and inform Clients of its location.

Total Number of Non Conformances on this CA Report:**6**

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Additional comments from the assessor:

Many thanks to Ryan Winn and Becki Quinn for their assistance with this second Company Audit.

Required Action Points arising from the above (to be addressed within six weeks):

Please addresses the 14 Non-conformances marked NC 1 – NC 16 above along with the elements requiring improvement on the Standards below. Please amend the SoC.; the relevant Written Operating Procedures and Method Statements, highlighting any changes in yellow.

Please follow the Guidance given on the LCA website for Internal Audit and Competence checks. [https://www.legionellacontrol.org.uk/_data/pdf/competence-2041706-17.pdf](https://www legionellacontrol.org.uk/_data/pdf/competence-2041706-17.pdf)

The company is to write to the assessor via the LCA secretariat admin@legionellacontrol.org.uk within 6 weeks indicating the steps which have been taken to address these action points providing, where required, documented proof of action. Any amendments to current documents should be highlighted. All non-conformances in the Company Audit Report and Checklists must be completed satisfactorily within 3 months of the date of the Report and the initial 6 week period will give sufficient time to fulfil final completion within 3 months. In the event of non-completion by this date, then the Company will be at risk of being removed from the LCA website until a satisfactory completion is achieved.

Summary of Assessment of Standards of Service Delivery

Service delivery scrutinised	Elements which met criteria	Elements which require improvement
Legionella Risk Assessment	Most	4, 5, 6, 9, 10 and 34
Cleaning & Disinfection Services	None	All
Legionella Analytical Services	Most	8 and 9

The company should address any shortfall indicated above in order to maintain this as one of their stated categories on their LCA certificate and website entry; **a short description of steps taken should be submitted to the LCA Secretariat.**

Signed:

Paul Trematick (LCA Assessor)

Date: 16/11/2017