

### **Scope of Activities**

Robertson Facilities Management (Robertson FM) is part of the Robertson Group and is an innovative company which continually drives new standards in the delivery of FM services. Robertson FM holds LCA registration appropriate to the service categories provided. This can be verified by visiting the LCA website [www.legionellacontrol.org.uk](http://www.legionellacontrol.org.uk) and is also highlighted in **RFM-HS-40-FOR-017** "Robertson FM L8 Service Agreement". LCA certification and the code of conduct can also be viewed on the Robertson Group website at <http://www.robertson.co.uk/legionella-compliance>.

We have an extensive portfolio of public and private sector clients, delivering bespoke solutions across healthcare, educational and commercial facilities throughout the UK. Robertson FM aim to provide a complete service for all of our clients, including property and building maintenance, grounds and garden maintenance, energy management, energy utilities, security, domestic services, catering services, waste disposal, pest control, helpdesk, emergency planning, reception, portering, janitorial services, survey and inspection, lifecycle replacement, ICT, infrastructure, disaster management and services designed to control the risks associated with legionella bacteria. Robertson FM delivers FM services both directly, using qualified in-house specialists and using carefully selected sub-contractors, following established industry approved selection procedures. In relation to water services, these in-house and sub-contracted services include:

- Installation
- Refurbishment
- Servicing
- Design and supply.

The services performed to control the risks associated with legionella bacteria by the in-house water services and maintenance team includes onsite domestic hot and cold-water monitoring and maintenance regimes, clean and disinfection of domestic water systems, legionella risk assessments for domestic hot and cold-water system and (UKAS) microbiological laboratory services.

The domestic hot and cold-water monitoring, maintenance regimes and clean and disinfection of domestic water systems is performed using in-house resources or sub-contracted to other water treatment companies. Only sub-contractors used will be LCA registered.

Robertson FM has developed a format and process for the legionella risk assessments for domestic hot and cold-water systems which can be used by suitably trained Robertson FM employees. In addition, the Robertson FM document can be used by sub contractors.

Alternatively, risk assessments developed by sub contractors can also be used and where possible these will be LCA registered.

All microbiological analysis is performed by UKAS approved laboratories.

## **1. Allocation of Responsibilities**

**1.1** The hereby named document **RFM-HS-40-FOR-017** states all service users must follow the named documents in respect of legionella control to comply with the law. The Approved Code of Practice and Guidance “Legionnaires’ disease, The control of legionella bacteria in water systems (L8 4<sup>th</sup> edition) and HSG274 parts 1, 2 & 3 give practical advice on the requirements of the Health & Safety at Work Act 1974 (HSWA), The Management of Health and Safety at Work Regulations 1999 and the Control of Substances Hazardous to Health Regulation 2002 (COSHH) concerning the risk from exposure to legionella bacteria. In the case where the site is classed as Healthcare then the (s)HTM 04-01 guidance must be used. The Formal Management Procedure **RFM-HS-40-PRD-006**, “New L8 Contract Procedure – Completing the Robertson FM L8 Legionella Service Agreement” details the procedure to follow in order to generate formal contracts between Robertson FM Water Services team and our clients for works associated with the control of legionella bacteria in hot and cold domestic water systems and all named documents that service users must follow in respect of legionella control to comply with the law. We will also utilise the Health and Safety Executives, [IACL27 Legionnaires Disease – A guide for Employers](#) to aid us in this requirement.

Upon confirmation of winning tendered works to be the approved facilities management company Robertson FM Water Services team will plan the legionella maintenance works by completing a legionella maintenance schedule form entitled “Robertson FM L8 Schedule Template”. This form will be completed in line with the works requested by the client within the scope of works tender document to ensure all the required works are scheduled. The tender documents themselves are signed by both the client and Robertson FM in order to confirm the scope of contracted works to be performed by Robertson FM. Any legionella preventative works not highlighted in the tender document remain the client’s responsibility and they will need to ensure appropriate management systems are in place to control the risk of legionellosis. All monitoring programmes will be designed to comply with the relevant legislation and guidance based on the facility and assets identified. This information is either gathered from the client through previous risk assessments or asset registers or through the risk assessment process. Once all the information is gathered it is then uploaded onto the Concept PPM system planner for records and evidence.

**1.2** When tender documents have not been issued to define responsibilities for legionella preventative works Robertson FM provide a comprehensive legionella service agreement

document to the client entitled **RFM-HS-40-FOR-017** "Robertson FM L8 Service Agreement". The form **RFM-HS-40-FOR-017** "Robertson FM L8 Service Agreement" is used to formally allocate both Robertson FM's and the client's responsibilities in the control of legionellosis. The Formal Management Procedure **RFM-HS-40-PRD-006**, "New L8 Contract Procedure – Completing the Robertson FM L8 Legionella Service Agreement" details the procedure to follow in order to generate formal contracts between Robertson FM Water Services team and our clients for works associated with the control of legionella bacteria in hot and cold domestic water systems. This form formally advises our clients of their obligations under the Health and Safety Commission's Approved Code of Practice and Guidance legionnaires' disease, The control of legionella bacteria in water systems (L8 4<sup>th</sup> edition) and HSG274 parts 2 & 3. This document gives practical advice on the requirement of the Health & Safety at Work etc ACT 1974 and COSHH regulations concerning the risk from exposure to legionella bacteria. The service agreement will firstly make clear which water systems are to be included in the contract for L8 compliance works. In addition, the agreement will define the associated L8 tasks which Robertson FM Water Services team contracts to provide in order to help ensure compliance to L8 and HTM/SHTM 04-01. Furthermore, this document is also used to define the additional duties and tasks that the company does not contract Robertson FM Water Services team to perform and highlights that these duties and tasks to be performed are the sole responsibility of the client or the Robertson FM sub-contracted water treatment company stated. The service agreement also requests that the agreement should be signed and returned to confirm the client's acceptance. If no agreement is returned the service agreement notifies the client that it will be considered by Robertson FM Water Services team to represent the scope of the agreement, we have with the client and if this is not the case then they must contact us immediately.

## **2. Training and Competence of Personnel**

**2.1** Robertson Group Ltd has a Human Resources Policy and Procedures Manual which details the Training and Development Policy (section 9) for our employees. Robertson FM recognises that its most important resource is its people. A Staff Objectives and Appraisal Scheme is therefore implemented throughout the Group which establishes a framework whereby:

- Key result areas are identified for each post.
- Objectives are established for each individual for the coming year.
- Each individual's performance and attainment of objectives is formally appraised.
- Initial individual training needs are identified and brought together into a Training Plan once approved by the Managing Director. This is done by following procedure RFM-HS-40-PRD-009 and recorded on RFM-HS-40-FOR - 019

- Promotion potential is assessed.

**2.2** The Robertson group has a training policy which states that “All employees will be trained to perform their current roles effectively and available opportunities for development will be offered equally to all, subject only to the employee’s interest, commitment and ability to benefit from the opportunity”. It is the responsibility of every Manager and Supervisor to ensure that this policy is fulfilled and to ensure that the effective management of all allocated human resources in terms of their development and deployment is achieved. **RFM-HS-40-PRD-009** “Training and competence of legionella personnel” details the outlines to be taken when assessing training requirements where **RFM-HS-40-FOR-019** “Competency reviews” are completed and **RFM-HS-40-FOR-053** L8 Individual Training Matrix is updated. To aid auditors in carrying out auditing duties refer to **RFM-HS-40-PRD-007**, Training and Competence guide for auditors.

When specific legionella training is required in order for the employee to complete their duties Robertson FM will ensure that they are suitably qualified and competent to perform works associated with the control of legionella bacteria. To ensure individual legionella competency a competency review is performed at least on an annual basis by completing **RFM-HS-40-FOR-019** “Competency Review”. The competency for Robertson FM employees tries to match the LCA training matrix as close as possible to ensure competency. Any addition training requirements are performed by LCA approved training establishments and covers the below areas;

- Legionella Awareness, Microbiology and Origins of Legionella.
- Legionella Legislation and Regulation.
- Microbiological Sampling of Water.
- Microbiological sampling strategy, interpretation and reporting.
- Risk Assessment Theory.
- Risk Assessment surveys.
- Water regulations & equipment design and installation standards.
- Completing a work report.
- Record keeping requirements.
- Conducting a review with client.
- Clean & disinfection techniques.
- Clean & disinfection safety.

**2.3** Maintaining records of training, competence assessments and annual competence validity checks are done by **RFM-HS-40-PRD-009** “Training and competence of legionella personnel” details the outlines to be taken when assessing training requirements where **RFM-HS-40-FOR-019** “Competency reviews” are completed and **RFM-HS-40-FOR-053** L8 Individual Training Matrix is updated.

**2.4** Robertson FM Employees are kept up to date with new regulations by ensuring regular refresher training and company memorandums highlighting the key regulatory alterations. Where any standards are updated then this will be noted in the individuals L8 Training Matrix RFM-HS-40-FOR-053 that they have received these changes.

If sub-contractors are used, they are required to provide details of training and assessed competence of the personnel performing the works. These records are held in our database system under the corresponding sub-contractor. Under all circumstance's contractors will be assessed for competency by following **RFM-HS-49-POL-001** "Management of Contractors".

### **3. Control Measures**

**3.1** Robertson Facilities Management is registered for the following services with the LCA

- Legionella Risk Assessment Services
- Hot and Cold Water Monitoring and Inspection Services
- Clean and Disinfection services
- Legionella Monitoring Services
- Plant and Equipment Services

Where further information is required this can be found on the LCA website.

All procedures for the above are noted in the following sections.

**3.2** The implementation, design, monitoring and maintenance of legionella preventative control measures for domestic hot and cold-water systems is based on a number of documents;

- Current up to date legionella risk assessment.
- All monitoring contracts are designed by utilising procedure **RFM-HS-40-PRD-006**, "New Contract Procedure". These are designed to comply with the relevant legislation and guidance based on the assets identified by the client or through the risk assessment process. This is then uploaded onto the Concept PPM system. Individual engineers will only be given the specific tasks they are suitable trained and competent for. This is done by PPM tasks being auto assigned to engineers at start of contract by Water Services Manager.
- **RFM-HS-40-FOR-017** "Robertson FM L8 Service Agreement" or signed tender document to define allocation of works and responsibilities. The procedure to follow when new contracts are won to define responsibilities is detailed in **RFM-HS-40-PRD-006**, "New Contract Procedure".

All legionella preventative works are scheduled according to the completed and signed service agreement document by completing the "Robertson FM L8 Schedule Template". Works scheduled will be signed off by the water services manager or service engineer once the works have been completed. The water services manager will also review all scheduled works to ensure that no planned visits are missed. This is currently performed using a system called "Concept" which generates all PPM L8 scheduled works.

- Detailed engineer reporting documents have been designed for recording all works associated with the control of legionella bacteria (**RFM-HS-40-FOR-002 to RFM-HS-40-FOR-013**). The procedure to correctly complete these forms is detailed in **RFM-HS-40-PRD-001** "Completing an L8 Water Treatment Service Report".
- Robertson FM Legionella preventative control procedures including; safe system of works 29 a-t, safe method statements and activity risk assessments.
- Annual control of legionellosis reviews are completed by holding client meetings to complete the form **RFM-HS-40-FOR-016** "Control of legionellosis review". This is completed by following the **RFM-HS-40-PRD-002** "Conducting a Control of Legionellosis Review".
- Robertson FM use **RFM-HS-40-FOR-001** "L8 log book" to act as a framework in order to help Robertson FM, managers and maintenance personnel to comply with legionella legislation. The log book provides the following;
  1. A detailed program for controlling the risk of legionellosis.
  2. A structured framework for implementing and managing the precautions.
  3. Reporting documents in order to help record the precautions implemented.
- Current copies of Health and Safety Commission's Approved Code of Practice and Guidance "legionnaires' disease", The control of legionella bacteria in water systems (L8), Health Technical Memorandum 04-01: Safe water in healthcare premises and the Scottish Health Technical Memorandum 04-01: Water safety for healthcare premises.

**3.3** The Robertson FM procedure for addressing general non-conformity results is detailed in FMP13 "Management of nonconforming product, corrective and preventative action". **RFM-HS-40-PRD-005** "L8 Corrective Action Responses to Out of Specification Results in Domestic Hot and Cold-Water Systems" provides guidance on the process to follow when reporting L8 non-compliant results. In addition, this document also details the remedial works that can be recommended in order to address non-compliant results including micro-biological non-conformities. All out of specification results are recorded on **RFM-HS-40-FOR-011** "Robertson FM OOS WTSR" and presented to the client in order to make them aware of the non-conformities identified. This form also details guidance on corrective actions that can be taken in order to resolve the non-complaint results to reduce the risk of exposure to legionella bacteria. Finally, these forms are also used to verify that the corrective actions detailed have been completed. If these non-conformities are not rectified or the risk of legionella exposure is significant then risk notification forms entitled **RFM-HS-40-FOR-014** "Robertson FM L8 Risk Notification" are also used to highlight these serious non-conformity issues.

Water treatment services are delivered in-house. This includes the introduction of chemicals to the water system. Chemicals are selected for their efficacy and safety, based on the system design and material. Prior to use, they are stored in accordance with manufacturer's

recommendations and COSHH assessment. Onsite analytical and monitoring takes place during water treatment services.

**3.4** All calibration records are held in a database where monitoring equipment is tested on an annual basis or when suspected that it is no longer valid. RFM-HS-40-PRD-010 – Testing and Calibration of monitoring equipment is used to follow these procedures.

#### **4. Communication and Management**

**4.1** Water treatment service reports are used to record all L8 duties performed by Robertson FM that is associated with the control of legionellosis and also act to highlight any results that deviate from the normal control limits. The procedure for completing all service reports is detailed on the formal management procedure **RFM-HS-40-PRD-001** “Completing a L8 water treatment service report”. Before any works are commenced, it has to be agreed with the service user who appropriate contacts are in the event of routine or emergency communications, The duty holder and responsible persons have to be identified. A copy of the completed report is provided to the client onsite after the works have been completed. Where possible the client’s signature is obtained to confirm receipt of the report and acknowledgement of any non-conformity that have been highlighted.

**4.2** Copies of the completed reports will be submitted to the Water Services Manager who will review the report and issue subsequent non-compliance reports by completing **RFM-HS-40-FOR-011** “Robertson FM OOS WTSR”. These reports will be delivered via email to the Robertson FM corresponding Contracts Manager who is responsible for managing the client’s site. Areas of non-compliance will be discussed with the client and corrective action taken.

**4.3** Where during the course of a contract and any changes have been made then the service user must provide the details of additional assets etc to be monitored. This would be classed as a variations in the contract. The service provider will bring to the service user’s attention any matters affecting the control of Legionella of which they have become aware beyond the responsibilities of their service provision. This will be done using **RFM-HS-40-PRD-005** and an out spec form will be completed and forwarded to Responsible Person identifying the matter affecting the control of legionella.

**4.4** Where no satisfactory corrective actions are taken an escalation process will be implemented in line with the current SHEQ guidelines for action monitoring and recording, which includes reporting directly to the Managing Director actions that remain overdue and outstanding past 1 calendar month past their due date. Guidelines on the corrective action responses to take can be found in **RFM-HS-40-PRD-005** “L8 Corrective Action Responses to Out of Specification Results in Domestic Hot and Cold-Water Systems”. Should a situation arise where corrective action has been performed by a Robertson FM employee it will be highlighted on the engineer’s water treatment service report.

All positive legionella results will be reported from the laboratory to the Water Services Manager. If the Water Services Manager is absent or not contactable then procedures are in place for the Water Services Supervisor to contact relevant Contracts Manager responsible for managing the client's site to be contacted via telephone and subsequent email to confirm count and serogroup identified. The Water Services Manager or Contracts Manager will then contact the site contact via telephone and subsequent email to inform them of the positive result. Further advice on correct responses to positive legionella results can be obtained from **RFM-HS-40-PRD-005** "L8 Corrective Action Responses to Out of Specification Results in Domestic Hot and Cold-Water Systems" or L8.

Should the situation arise where significant matters affecting the control of legionellosis are identified and are out with or within the specified responsibilities of the contract then a Potential Risk Notification Report **RFM-HS-40-FOR-014** "L8 risk notification" will be issued to the site contact detailing the area of concern. Where risks identified fall out with the specified responsibilities of the contract a discussion would take place to identify any appropriate variations to contract.

Where no action has been taken by the responsible person within a reasonable timescale the water services manager will follow procedure FMP29c, and where there could be serious risk concerns to client staff, Robertson FM Staff or member of the public then L8 Risk Notification Report **RFM-HS-40-FOR-014** will be repeated and if no action is taken then a formal escalation will be initiated. Robertson FM will then write to the Duty Holder formally outlining the concerns using Legionella Compliance Escalation Letter (.....) along with all previous correspondence and seek a commitment by the client to act.

Where after formal escalation of the issues has not been resolved or the client has chosen to ignore the problem and all communication process has been exhausted and there is still a serious risk then all concerns will be reported to the relevant enforcing authorities.

Legal advice will be taken in the event where Robertson FM request anonymity and the client refuses to accept this request.

We will furnish the Client (or their representative) a copy of our conduct code and a copy of our LCA registration certificate at all stages, whether it is at Pre-qualification, tender submission, contract award and upon renewal of certification.

All contract contact details are held on **RFM-HS-40-FOR-023** "Record of Responsible Persons". This ensures that we have readily available contact details for our principal site contact and other site contacts to ensure that when the need arises, we can contact the client easily.

## **5. Record Keeping**



5.1 All records associated with the control of legionellosis are maintained and stored at the Stirling HQ building and include the following documents; service agreement document or tender details, water treatment service reports, cold water storage tank inspection reports, calorifier inspection reports, disinfection and cleaning reports, showerhead disinfection and descale reports, microbiological reports, site correspondence, risk notification and site audits. These documents are held within site specific folders and are retained for a minimum of 5 years.

The Robertson FM procedure for keeping and maintaining records is detailed in FMP05 "Control of Records". **RFM-HS-40-PRD-004** "Control of Customer L8 records" provides guidance on the process to follow when keeping and maintaining records associated with legionella compliance. All engineer reports are correctly filed in accordance to these management systems. This ensures that all copies of the reports are filed within the client's site-based log book, and where required a copy of the report is returned to the Stirling Office by the service engineers. Contracts Managers or the Water Services Manager file the copies of the report within the office-based site specific L8 legionella logbook. Alternatively, an electronic copy may be recorded completed, with copy being left in site L8 log book and a copy being e-mailed to the Water Services Manager at Robertson FM Stirling office.

To aid the client Robertson FM will issue a control of legionellosis log book which is to be located on the client's site. This log book contains a detailed program for controlling the risk of legionellosis, a structured framework for implementing and managing the precautions and reporting documents in order to help record the precautions implemented. Log book is audited during annual review.

5.2 The service agreement informs the client that they should store all L8 associated records within the site log book and retain them for at least 5 years. The client may wish to utilise alternative recording methods, but it should be noted that it remains the client's responsibility to ensure that the log book and site records are kept up to date. The clients responsibilities are noted in the service agreement.

5.3 All records must be retained for a minimum of 5 years whether they are the service users records or service providers records. All records must be made available.

## **6. Reviews**

6.1 Formal reviews are performed at least annually between Robertson FM and the client for each site and should be a face to face meeting to discuss the control of legionella bacteria. The review will cover the following areas as a minimum; accuracy of service agreement,

availability of current up to date legionella risk assessment, outstanding action points in the risk assessment, history of control measures implemented, availability of site records, actions to out of specification results and recommendations, any client training requirements through the risk assessment process, areas of concern, possible areas for improvement, and an agreed action plan to help reduce the risk associated with legionella exposure.

Procedures for completing a formal review are documented in the **RFM-HS-40-PRD-002** "Conducting a control of legionellosis review" and the actual reporting document is **RFM-HS-40-FOR-016** "Control of legionellosis review".

6.2 Client training needs are assessed, through discussion and evaluation of training records (if available) at pre-contract stage and on an annual basis by completing the control of legionellosis review. Where client training is required contact details of LCA approved training organisations will be provided to the Client.

## **7. Internal Auditing**

**7.1** The Robertson FM procedure for performing internal audits is detailed in FMP07 "Internal Audit". A comprehensive legionella internal audit is performed at least annually by following **RFM-HS-40-PRD-003** "Conducting an internal legionella audit" and completed using **RFM-HS-40-FOR-018** "Internal Audit and **RFM-HS-40-FOR-021** "Compliance with the Code of Conduct for Service Providers".

This will establish compliance with each of the service provider commitments and also includes audits on our own internal procedures. The data obtained from this audit is reviewed and analysed to ensure that the key service commitments are achieved. If it is identified that areas of non-compliance exist then appropriate measures will be actioned in order to resolve the situation.

**7.2** A representative sample of output/records will be submitted along with any auditing. This will ensure that the Management System is effective and correctly applied.

**7.3** A corrective action plan is detailed at end of audit document where this requires signature/date that this is now completed.

## **8. Sub Contractors**

**8.1** Not applicable – only LCA Registered are used other than UKAS Labs

**8.2** Competency reviews are required on all LCA Members who carry out work on behalf of Robertson FM. These have to be provided on requested. Where these are not provided then they are subject to the compliants procedure

The management of contractor's procedures is detailed in **RFM-HS-49-POL-001** "Management of Contractors". This procedure clearly assesses company competency by completing stage 1 and stage 2 contractor assessments. Competence is assessed and reviewed by the Contracts Manager and Water Services Manager to ensure that any contractor used holds an independent registration under the Code of Conduct. To aid the auditors in carrying out this duty, refer to **RFM-HS-40-PRD-007** "Training and Competence guide for auditors".

Where it is not relevant for a maintenance contractor to be LCA registered, efforts are made to ensure that they are competent to perform the works. This is assessed in accordance with **RFM-HS-49-POL-001**.

In all circumstances sub contractors will be monitored regularly by following the Stage 3 process in the Robertson FM Management of Contractors (**RFM-HS-49-POL-001**) process. In situations where work is sub-contracted off site (for example, the offsite analysis of samples), samples are taken by the Water Services team and delivered to a UKAS accredited laboratory. Robertson FM currently do not utilise sub contractors for Legionella control services. Where in circumstances that this may be required the above procedures will be followed.

**8.3** As per 8.1 no non LCA Sub contractors are used.

**8.4** As per 8.1 no non LCA Sub contractors are used.

## **9 Distribution of the Code**

9.1 Robertson FM holds LCA registration appropriate to the service categories provided. This can be verified by visiting the LCA website [www.legionellacontrol.org.uk](http://www.legionellacontrol.org.uk). LCA certification and the code of conduct can also be viewed on the Robertson Group website @ <http://www.robertson.co.uk/legionella-compliance>. This is detailed in the service agreement.