



Legionella Control Association Code of Conduct 701.20 07-23 Eurofins Statement of Compliance

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Revision History:

- Issue 8, 29th July 2015. Document references updated throughout to reflect the current documents.
- Issue 9 08th July 2016 Changes to Reflect change of ownership to Eurofins and the additional of the reference to method GMM251 Legionella by PCR to clarify position to subcontract only when cannot be done in-house.
- Issue 10 06th July 2017 Changes to reflect changes in method and procedure references and to align with Eurofins policies and procedures.
- Issue 11 08th January 2018 Changes to reflect change of business name and change to reflect position regarding subcontract of non PCR samples.
- Issue 12 18th October 2018 Section 4 updated to include reference to laboratory's formal escalation procedure Speak-up policy and Complaints procedure SOP CLIENT/007.
- Issue 13 19th October 2018 Clause 8.4 regarding sub-contracting Legionella analysis added in section 8 Sub-contractors.
- Issue 14 2nd January 2019 Clause 2.2 and 8.1 updated to include Legionella method MW28. Also 'quotes' removed from the last statement in clause 1.4
- Issue 15 8th January 2019 Clause 2.2 and 8.1 updated to include Grimsby method 30.1. Also Eurofins Europortal system is referenced in the Statement of Compliance. Also removed Advantage email address as no longer in use and replaced with Europortal address. Updated 6.4 to include details of client review form.
- Issue 16 17th January 2020 Clause 5.3 updated to include reference to training for Europortal and the "Europortal Step To Guide" instruction sheet for Engineers
- Issue 17 9th November 2020. Clause 7.3 updated to ISO17025:2017 and Clause 7.4 updated to include Grimsby as part of UKLAS accreditation Number 9658

- Issue 18 1st November 2021. Entire document updated to match the 2021 issued Code of Conduct 701.18 04-21
- Issue 19 17th December 2021. Entire document updated to match the 2021 issued Code of Conduct 701.18 04-21
- Issue 20 10th February 2022. Updated following the LCA audit to the new Code of Conduct 701.18 04-21
- Issue 21 11th February 2022. No update, corrected a numbering issue in section 2
- Issue 22 updated following review of new Code Of Conduct 701.20 07-23, Sections 7 and 8 updated.

Definition: In regards to this Statement of Compliance, the term “Eurofins” is used to mean “Eurofins Water Hygiene UK Ltd” only.

1. Allocation of Responsibilities

- 1.1) It is the Client’s responsibility to ensure they comply with all relevant law in the respect of Legionella control. Eurofins only offers laboratory based Legionella Monitoring Services. Eurofins does not offer any form of interpretation of the data that it provides.
- 1.2) Eurofins shall, by the use of a formal quotation produced by ComLIMS-QUOTATION, as a minimum, make clear that the only services that Eurofins provides are as follows:
 - Eurofins offers a full Legionella analysis and identification service only. Eurofins does not offer any form of interpretation of the data that we provide
 - Eurofins does not offer any form of sampling service, other than the collection of the samples from a site or an agreed location between Eurofins and its client.
 - Eurofins provides bottles for sampling which contain sodium thiosulphate as a neutraliser for certain biocides. It is recognised that this does not neutralise all biocides used within the water industry, specifically for waters sampled from cooling towers and process waters. Eurofins notifies all its clients of this via the quotation.
 - All other areas required to ensure compliance with Law, Regulation, ACoP and the LCA standards for service delivery are to be met by the Client’s own services.

ComLIMS-QUOTATION is part of the Eurofins Laboratory Information Management System which will produce uniquely identified and version traceable quotations that contain, amongst other information, the information detailed above. By use of this module, quotations are produced in a controlled format and will contain this information at all times.

2. Training and Competence of Personnel

- 2.1) All staff conducting Legionella analysis within the Water Microbiology Laboratories of Eurofins are subject to training conducted in accordance with the Quality Manual and General 30 for the In-house Methods MW28 and other associated procedures, with regards to the analysis of Legionella. This specifies the initial and ongoing training required for staff to undertake Legionella testing.

Staff training is conducted in accordance with the Quality Manual and General 30 is recorded in each person’s training record using the following forms:

Water Microbiology Competence Record which documents the method reading demonstrating and assessment, supported by individual method data recorded on Training Record - Testing of Legionella Samples, Training Record-Confirmation of Legionella spp. and Legionella pneumophila by Culture as relevant to the section of the method the staff member is trained to. Methodology is split into 2 sections, preparation of the sample up until the results are to be read and calculated and reading/calculation of results.

Staff are required to read and show understanding of the section of the method they are being trained in, be assessed in practice by an accepted Trainer and to be signed as competent to work without instruction for testing to up to but not including the point of plate reading to test 5 separate samples, over at least 3 different occasions and produce results for that sample testing within ± 0.3 log of the trained persons values for the same samples. To be considered competent in reading and confirmation the staff member must show the ability to confidently identify the suspect colonies and satisfactorily complete the associated confirmations tests as detailed in the test method on 3 separate occasions.

All staff within the Laboratories who undertake Legionella Testing will be required to participate in the Laboratories Internal Quality Control Programme as detailed in General 13 Quality Control of Water Methods and in a suitable External Proficiency scheme (Quality in Water Microbiology Scheme, QWAS) as detailed in the General 27 Proficiency Testing Procedure. Records of these tests are kept in the site's EQA Participation Record and Site Legionella IQC Record workbooks.

The local staff training matrix is updated monthly to reflect changes in responsibilities, competency and personnel by the site Quality Coordinator. The training record is updated and controlled by a senior member of staff within the laboratory.

- 2.2) Staff training is conducted in accordance with the Quality Manual and General 30 is recorded in each person's training record using the following forms: Water Microbiology Competence Record which documents the method reading, demonstrating and assessment, supported by individual method data recorded on Training Record - Testing of Legionella Samples, Training Record-Confirmation of Legionella spp. and Legionella pneumophila by Culture as relevant to the section of the method the staff member is trained to.

The collated data is used to monitor on-going competence.

- 2.3) Training for all staff within the Laboratories who undertake Legionella Testing is recorded in each person's individual training record. This includes the data from the use of Internal Quality Control Programme as governed in General 13 and in a suitable External Proficiency scheme as governed by General 27 and is reviewed at least annually for each member of staff.

Staff training is conducted in accordance with the Quality Manual and General 30 is recorded in each person's training record using the following forms: Water Microbiology Competence Record which documents the method reading demonstrating and assessment, supported by individual method data recorded on Training Record - Testing of Legionella Samples, Training Record-

Confirmation of Legionella spp. and Legionella pneumophila by Culture as relevant to the section of the method the staff member is trained to.

- 2.4) Eurofins keeps abreast of developments in the field of water microbiology and Legionellosis by reviewing relevant documentation including codes of conduct, Health and Safety bulletins, International (ISO), European (EN) and British Standards (BS) and the Microbiology of Drinking Waters.

3. Control Measures

- 3.1) Eurofins holds LCA membership and is registered with the LCA for Legionella testing only. This is communicated to clients via this Statement of Compliance. This is communicated to every client via the Formal Quotation produced by the ComLIMS-QUOTATION module used to produce every quotation for testing.

ComLIMS-QUOTATION is part of the Eurofins Laboratory Information Management System which will produce uniquely identified and version traceable quotations and carries the link to Accreditation and LCA Scope of Compliance in the defined format of the quotation.

- 3.2) Eurofins only provides Legionella testing and no other control measure for Legionella in water systems. All staff carrying out Legionella testing are suitably trained in accordance with the Quality Manual and procedure General 30.

Staff training is recorded in each person's training record using the following forms: Water Microbiology Competence Record which documents the method reading demonstrating and assessment, supported by individual method data recorded on Training Record - Testing of Legionella Samples, Training Record-Confirmation of Legionella spp. and Legionella pneumophila by Culture as relevant to the section of the method the staff member is trained to.

- 3.3) Eurofins has systems and procedures in place to ensure that any non-conforming work/anomalies that are identified within day to day operations are recorded and investigated as appropriate. These procedures are detailed in QA010 and recorded in accordance with these procedures on the D4 system. In addition, the Laboratory operates a procedure for Handling Complaints using procedure CLIENT/007 and complaints are recorded on the D4 system. A NCW form is used where a full investigation is required and is attached to the D4 system along with any supporting documentation.

The role of D4/NCW form is to capture the details of an anomaly that may result in corrective/preventative actions being undertaken and are effective.

GGP03 further defines the policy and process involved in the management and investigation of any laboratory generated non-conforming work. If there is no corrective/preventative action to be undertaken, then the staff member undergoes corrective training to ensure that the anomaly will no longer occur.

The following procedures relate to recording of specific types of laboratory generated anomalies however, all generated NCW/anomalies are logged and processed via the D4 system.

General 27 Proficiency Testing Procedure

General 13 Quality Control of Water Methods

- 3.4) Eurofins offers no field testing equipment and therefore does not have any validation or calibration requirements in this regard. All Laboratory equipment used in the testing service offered is suitably calibrated and maintained as described in the Calibration Handbook, held on D4.

4. Communication

- 4.1) Eurofins holds on file the named contacts for routine and, if required, emergency communication. The client is responsible for ensuring that the duty holder and responsible person for the Legionella control are known to them, Eurofins only supplies testing service information to the client. These are gathered as part of the Quotation process using ComLIMS-QUOTATION and are stored in the CRM module of the LIMS.
- 4.2) Eurofins shall use these contacts to inform the client of any non-conforming work as recorded in the D4 system which could affect the validity of the testing results supplied under the testing service provided. This is detailed in the procedure:
- QA010 Non-compliances, preventive actions, process improvements.
- 4.3) Section 4.3 of the LCA Code of Conduct is not relevant as Eurofins does not attend the site of the water systems and only analyse on an as received basis.
- 4.4) Routinely Eurofins shall forward, at the earliest opportunity, a notification of Legionella results where the result is positive as an out of specification notification. This notification is forwarded by email to the designated contacts. Eurofins does not telephone these notifications.

With regards to the conduct of the contract, The Sales Team at Eurofins visit clients regularly to discuss the performance of the laboratory and review the service levels over this period. This gives all clients the opportunity to raise any issues, concerns or criticisms to the Sales Team – at which point the Eurofins staff member will raise a D4/NCW with the lab to ensure that any serious matters are investigated. Review meetings are documented.

If a client has a concern with any aspect of the services provided at any time, then they can contact the laboratory directly with their concern and a D4/NCW will be raised, initiating an investigation. The outcome of the investigation will be communicated to the client along with any recommendations. This is carried out via a formal complaints procedure which is detailed in SOP CLIENT/007

An Escalation Letter would not be issued by Eurofins as we do not hold information about any specific water system and the condition of such systems, nor actions or lack of action by the duty holder. Eurofins only provides analysis for Legionella on an as received basis for each sample.

5. Record Keeping

- 5.1) Records to be kept include all technical records generated during the Legionella testing service including sample submission records provided by the client, all testing data, Out of Specification notifications, final reports and invoices. This is documented in the procedure QA008 - Document Control Procedures. Control of stored hard copy records, both from clients and internal is via the supplier portal where each box and the box contents can be tracked.

Where certificates are held on the Europortal system, Eurofins shall ensure these are maintained and accessible.

Where the client is responsible for submitting samples via Europortal it is the responsibility of the client to ensure that the data is entered correctly and sufficiently. Data extracted from Europortal by the client is not the responsibility of Eurofins. Once the data is extracted from the system the responsibility of managing and maintaining the data transfers to the client.

Reports generated by Eurofins will not be divulged to a third party unless as directed to by the client and only following written confirmation of this.

- 5.2) Eurofins shall only keep records of its own actions and sample information. It is not Eurofins responsibility to define what records, method of storage or access for any information generated by its clients with regard to control of Legionella. Records may be retained either as hardcopy or electronically, dependent on the means of generation. This is documented in the procedure QA008 - Document Control Procedures

Where records are held on Europortal, this is via the internet and a secure on-line connection. In order to access a client-specific page, the client would need their unique *Customer Reference*, *Username* and *Password*, all of which are only known to the client; it is recommended to all clients that their password is changed on a regular basis to enhance security. When a client is set up to submit samples via Europortal, training is given on how to use this portal and the client receives the "Europortal Step To Guide" which can be used for internal training of engineers by the client.

The number of users of Europortal for any one client is dictated by the client. It is the client's responsibility to ensure that only valid and active staff have access to the Europortal site.

- 5.3) It is the policy of Eurofins that all records are maintained for a period of at least 5 years. Records may be retained either as hardcopy or electronically, dependent on the means of generation.

6. Reviews

- 6.1) In order for both parties to review the service provided by Eurofins, it actively seeks an annual meeting to discuss all aspects of the Service & Testing Level Agreement (STLA) review.

Topics covered during a routine STLA review include the service of the lab, turnaround times, reporting issues, collection issues, invoicing issues, Europortal issues and any advancements that Eurofins have made that the client may not be fully utilising that have occurred over the past 12 months. This is not an exhaustive list and a review may include other areas as appropriate.

If any significant issues are raised at the STLA review, then this will result in Non-Conformities being raised if appropriate and discussions with the lab being undertaken to resolve any issues.

The procedure for undertaking reviews, including the specific requirements for Legionella Control Association, is covered in SOP350. Minutes of meetings are recorded on Eurofins CRR Client Review Form and stored in Eurofins CRM system.

- 6.2) If requested at the review, Eurofins is pleased to offer a free technical seminar on the analysis of Legionella. This seminar details the obligations of Eurofins and of its clients from when the sample is taken to when the report is issued. Eurofins does not offer assessment of its clients' staff training needs beyond the area of Legionella testing.

7. Internal Auditing

- 7.1) Eurofins Water Hygiene Testing UK Limited - Wolverhampton (UKAS No. 9658) operates a multisite accreditation covering the Heathrow, Livingston and Grimsby facilities as satellite labs of Wolverhampton. Management is undertaken centrally from Wolverhampton. All locations operate to a corporate Quality Manual and Governing procedures. Where local deviations exist these are appropriately detailed.

Eurofins is UKAS accredited to ISO/IEC UKAS 17025:2017, each individual location is responsible for maintaining its individual accreditation. Each site is audited annually by a team of UKAS assessors who raise any improvements required by the lab.

As part of each site's accreditation, a programme of internal audits is in place. These internal audits are carried out in accordance with the 'Laboratory Audit Manual'. The audits are designed to determine the correct operation of the site with the documented procedures and methods as well as to highlight any areas of method development or improvement that could be undertaken to ensure that the best possible service is provided to clients. This audit programme includes an annual internal audit of Eurofins Compliance with the Legionella Control Association Code of Conduct, current reference: EUWW.EUHW.EULIV.EUGW.LCA.23.1

- 7.2) Internal audits cover all details of the area being audited, including but not limited to technical records, calibrations, training records and data, on-going competence data, trends and biases. The audits are based on a specified schedule, System Audit Schedule 2023 and Method Audit Schedule 2023 which covers each area of ISO 17025 by section. These sections are the basis

on which the UKAS accreditation is maintained. Therefore, each section of the ISO 17025 Quality System is audited on an annual basis. In this way, Eurofins Water Hygiene Testing UK Limited ensures that all areas of its systems are audited.

- 7.3) If there are any non-conformances/opportunities for improvements raised in internal audits, then these are summarised on the audit report and raised on the D4 Infonet system to action. The auditor will agree actions and a timescale for closure of these, based on timelines are prescribed within the Quality System procedure AQ010. The actions will be monitored via the D4 Infonet system to ensure that they are closed out in a timely manner.

Any findings raised at internal and external assessments are discussed at the regular quality meetings, to determine the impact of the findings and to detect any systemic issues across sites.

- 7.4) Eurofins operates the procedure QA008 - Document Control Procedure to the current version or issue of any document is in use.

8. Sub-contractors

- 8.1) No Legionella testing is subcontracted outside of Eurofins Water Hygiene Testing UK Limited.
- 8.2) As no work is sub-contracted outside of Eurofins Water Hygiene Testing UK Limited, section 8.2 of the Legionella Control Association Code of Conduct is not relevant.
- 8.3) As no work is sub-contracted outside of Eurofins Water Hygiene Testing UK Limited, section 8.3 of the Legionella Control Association Code of Conduct is not relevant.
- 8.4) As no work is sub-contracted outside of Eurofins Water Hygiene Testing UK Limited, section 8.4 of the Legionella Control Association Code of Conduct is not relevant.

9. Promoting the Awareness of The LCA

- 9.1) Eurofins will publish copies of the Code of Conduct on the Europortal and on the Eurofins website (<https://www.eurofins.co.uk/quality/>). This link is sent to every client as part of the quotation process via the ComLIMS-QUOTATION module.

Any clients that cannot access the Eurofins website may request a copy of the latest Code of Conduct either by email or post.