

## Toolbox Talk – Formal Written Procedures

*I have been asked to produce a formal written procedure for my Legionella Control Association statement of compliance. What is this?*

A Statement of Compliance explains how your Management System meets the requirements and standards of service required by the Legionella Control Association (LCA). The Management System is the way you carry out your business.

*So the way I carry out my business is a single system?*

Yes – but it will consist of many procedures. There will be one for each task you carry out or service that you get involved in.

*A procedure is therefore the way I do things, rather like a method statement?*

You could consider a method statement as a way of describing a task. While a procedure may do this it will also include management and control of tasks. For example, you will have a procedure to ensure that method statements are issued when required and are produced at the right time and be of the required quality.

A set of procedures will support your Management System.

*The LCA Guidance talks about 'written management procedures' and 'formalised procedures'. What are these?*

Well the procedure describes how and when you do things, how you ensure these things are not forgotten, and how you record the results of the actions taken. A written management procedure is a written document describing how the procedure is managed. There will be a need to be able to look up these procedures and so a simple filing system will be required, in order to enable easy access. By entitling or numbering and referencing the procedures, they become formalised procedures.

A simple numbering system for all your many procedures will save you a lot of time when you need to explain or describe your procedures e.g. when you are training a new starter and will help the new employee understand his role more quickly. It will also help when your Statement of Compliance is being assessed and especially when the LCA auditors subject you to a site audit.

*We use computer-based systems. Can these procedures be incorporated into our systems?*

Of course, the auditors will accept any formal procedure recording system, but it must be accessible to those who need to know.

*Where can I get more information?* Read the Guidance Note on the Preparation of a Statement of Compliance.

*The following is an example of an acceptable layout for one section of a Statement of Compliance and is offered as guidance only, hopefully this will assist any company struggling with producing an acceptable format:*

### **1) Allocation of responsibilities**

JONES & CO draw up comprehensive service agreements with our clients for whom we are contracted to provide services associated with the control of legionellosis which:

- \* Formally advise our clients of their responsibilities as defined in the Approved Code of Practice (which gives practical advice on the requirements of the Health and Safety at Work etc Act 1974 and COSHH 2002 Regulations concerning the risk from exposure to legionella bacteria).
- \* Define the water systems for which the JONES & CO contracts to provide certain services associated with compliance with ACOP
- \* Define the scope of the services which JONES & CO contracts to provide associated with compliance
- \* Defines the additional duties and tasks that the company **does not** contract to undertake and for which the client must make his own arrangements for compliance.

Wherever possible the client is encouraged to sign and return the service agreement as his acceptance of it. Where he declines to do so a "Notice in Lieu of a Service Agreement" is sent to him.

The procedure for this section is '**SP036 - Allocation of responsibilities**' and is supported by forms and documents;

**Field Service – Service Agreements,  
"Notice in Lieu"  
and Agreement Quotations.**