



**STATEMENT OF COMPLIANCE**  
**June 2015 – Reviewed and Amended January 2016**

**Scope of Services**

ESC Global Ltd is a small to medium company and our part of a much larger international group (Environmental Speciality Chemicals Group of Companies). We have direct access to their associated expertise and use it where required.

We are specifically focused on 2 distinct areas of operation:

1] The service and management of water hygiene contracts with, primarily, local council type organisations in the North of England. The hygiene contracts include the monitoring and inspection of the hot and cold water supply, the offer of a clean and disinfection service and the offer of a water sample analytical service whereby we take water samples and despatch these to a UKAS recognised laboratory for their analysis and reports.

2] The supply of speciality chemicals for specific use in water hygiene contracts, cooling water, and boiler water.

The area of interest form has been duly completed by ESC Global and this is part of the registration process. However ESC Global are not currently registered with the LCA for some of these areas and are working toward gaining this registration in the near future. Please note when working with cooling water or boiler water ESC Global do not claim registration to the LCA.

**1. Allocation of Responsibilities. ESC Global Written Management Procedure 1**

**Customer Obligations**

The Duty holder has obligations under the legislation-

- Health and Safety at Work etc. Act 1974
- Control Of Substances Hazardous to Health Regulations 2002 (COSHH)
- Management of Health and Safety at Work Regulations 1999
- Notification of Cooling Towers and Evaporative Condensers Regulations 1992
- Reporting of Injuries Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR)

We explain that the customer has obligations, at the bottom of our quotation with information directing them to the HSE website for further information. We state at the bottom of our quotation - **'Agreeing to this quotation you have acknowledged that you have been advised on the obligation the duty holder has under legalisation'**.

**Service Covered**

Initially we will advise the client on all requirements pertaining to L8 ACOP 4<sup>th</sup> Edition and HSG274, this is normally done at initial meetings, emails or phone calls. Once the client has agreed on which services they would like perform by us we draw up a quotation documenting what our service will include. The quotation alone conforms to the legal obligation required by ESC Global. If the client has decided not contract ESC Global for specific services which we have advised them on, then these are highlighted within the quotation.

In some cases separate to the quotation a contract is draw up documenting the essential tasks that need to be completed by ESC Global. The contract alone conforms to the legal obligation required by ESC Global. Separately, the risk assessment also enables the person on whom the statutory duty falls

to show that all the pertinent factors and the steps needed to prevent or control the risk have been considered and where the responsibility lies.

The quotations and contract will state that ESC Global Ltd has LCA registration for the service categories being provided.

### **Contracts in Place**

All orders and contracts are to be confirmed in writing. All order and contract details are kept in hard copy in the filing system and filed electronically under client name.

## **2. Training and Competence of Employees. Written Management Procedure 2**

### **Training**

ESC Global provides training using external Sources BSRIA, Appserve and as of 2016 WMS.

The modules we focus on for ESC Global field staff are –

- The Risk Of Legionella In Cooling Tower Systems
- Legionella Risk Of Water Systems
- Cooling and Boiler Water Chemistry
- Clean and Disinfection
- Boiler Water Chemistry
- Cooling Water Chemistry
- Temperature Monitoring, Sampling and Inspection of Water Systems For Technicians
- Management and Control Of Closed Systems

All staff training certificates – formal and other – are recorded and records maintained in the HR/H&S folder system.

### **Competence of ESC Global Employees**

Internal competence assessments are performance on a 6 monthly basis. All services provided by ESC Global are done to as per a method statement. Competence is measured on the nature of the service, training received and the ability to follow the method statement. Documents are filed in individual staff files with the HR Manager. These documents reflect and are relevant to training, competence and general quality of performance in the areas of the scope of ESC Global business. Any concerns during an assessment will be discussed on a senior management level to discuss the correct actions, eg in house or external training, to make sure all field engineers are competent in the services they are carrying out and minutes taken.

We also employ Annual Appraisal Form on all members of staff however this is a general appraisal and does not solely focus on the services we provide.

### **Assisting a Customer in Their Training**

All clients training, formal and informal “hands on awareness training”, is maintained in the main folder “Training”. This includes copies of the bespoke presentations, records of attendees, and certification issued.

As legislation and suggested methods of operation changes these will be communicated with the relevant parties within the company and with clients.

### 3. Control Measures. ESC Global Written Management Procedure 3

#### Control Measures that are Set

The control measures vary from client to client. Site visits are essential in collecting relevant information, using our site visit reports.

Service visit reports – including comments regarding concerns and actions [by both ESC Global and customer] - are filed specific to that site in named client folders. All service visit reports are saved in 2 separate systems at ESC Global and these are backed up independently.

All the client's requirements and services are collected and presented to senior management. Requirements and services are discussed in detail and written proposals are forwarded to the client, normally via email.

Once the written proposal has been approved and quotations and contracts are agreed the written proposal will be implemented on site.

All clients are given site specific log books, containing details such as current LRA, ESC Global responsibilities, client's responsibilities and monitoring documents.

The monitoring document shows the frequency to which the service is performed, any categorised (low, medium, high) anomalies and corrective procedures with time limits. Once a monitoring document has been filled out it is instantly sent to the client and filed electronically and in the onsite log book.

If the corrective procedures are part of the ESC Global service then it will be performed immediately or as soon as practicable.

Responsibilities which lie with the clients we provide documentation for the client to sign and for our field engineers to witness – we do not always witness the actual event.

To ensure standard are met and maintained method statement are produced which the field engineers carry on them or in the site folder. 6 monthly audits on the field engineers are performed. Legionella samples are taken on a periodic bases and sent to an independent UKAS laboratory.

#### The Verification of corrective and preventive actions are implemented

On the service reports and LRA all preventive or corrective actions are categorised (low, medium, high) and are given an achievable time limit to rectify them. If the actions are part of the ESC Global service detailed in the quotation or contracts they will be rectified with the time limit and written confirmation sent to the client and LRA and on site log book updated accordingly. If the actions are the responsibility of the client then ESC Global will provide a quotation for the services. If applicable any actions which is the responsibility of the client and the corrective activity has not be performed then ESC Global will continue to highlight the action on the service reports.

#### LCA Standards for Service Delivery

ESC Global has a programme of control measures in place that satisfies the LCA Standards for service delivery.

#### 4. Communication. ESC Global Written Management Procedure 4

All system control deviations are documented on the service reports with preventative and corrective actions, these reports are sent to the client immediately and copies saved electronically and in the on site log book. If the deviation is of major concern then a phone call will be made between the ESC Global account manager and the client and relayed in an email with corrective and preventative recommendations.

##### **Reporting of Positive Legionella Test Results and Major TVC Deviations**

The requirements for water sample analysis are agreed with the client prior to undertaking any analysis. This is based on the requirements as written in ESC Global Decision Tree and as written in ESC Global Legionella Risk Management document.

The actual testing is undertaken by Alcontrol, a UKAS accredited company, for both Legionella and TVC.

Report Sheets/Certificates: Once results are received they are electronically reported to the client.

##### **Contact Lists between client and ESC Global:**

The recipients of all results are pre agreed with the client and they are always included on the address listing for sample analysis receipt. The client has the ESC Global office number (01302 360500) and also the direct number for their ESC Global account manager. Numbers can be found on emails, LRA front covers and ESC Global website.

##### **Documents for matters outside of the Initial Contract**

In all cases any extraordinary requirement is captured on the monthly service reports or LRA and is verbally or electronically communicated to the client. All matters outside the contract are categorised (low, medium, high) anomalies and corrective procedures with time limits. If they are the responsibility of the client then ESC Global will provide a quotation for the services. If applicable any actions which is the responsibility of the client and the corrective activity has not be performed then ESC Global will continue to highlight the action on the service reports.

#### 5. Record Keeping ESC Global Written Management Procedure 5

##### **What Records are kept and where?**

All quotations, discussions, suggestions, recommendations, contracts and general correspondence are filed in the customer specific folder and normally, depending on the size and scope of the client, under a further sub heading therein.

Water sample analysis certificates are filed in electronic client specific folders and in files marked Test Results and in on site log books.

Service reports are filed in electronic client specific folders and in files marked Reports.

ESC Global also operates a dual record system kept by both ESC Global Manager and Administration department as a back-up.

All of the above have reference to the month and date when saving the document.

##### **Who is Responsible for Up-Keep of Records?**

Individual log books are kept on site. It is ESC Global responsibility to maintain and inspect for completion of these site log books on each monthly service call. All documents – reports, certificates

etc are maintained on 2 separate electronic filing systems at all times. These systems are backed up and stored off site each month.

#### **6. Reviews ESC Global Written Management Procedure 6**

ESC Global hold pre-arranged meeting with the client to discuss all areas of the service package. Most meetings with clients are currently recorded in formal minutes and or notes. All formal minutes are filed in customer specific folders.

Informal meeting details are rarely confirmed in writing unless specific requirements from the meeting involve action by ESC Global.

Follow-up meetings occur with twice a year meetings with certain clients to discuss the specific action requirements we have captured on their monthly site reports. They then undertake to rectify per our suggestions. In the event this undertaking has not occurred it is captured again in the next monthly call report.

As distinct from an annual review meeting with the customer ESC Global adopts a continuous review platform utilising monthly, quarterly, 6 monthly and annual review meetings where each customer is assessed to determine the number and frequency of review meetings to be undertaken. In all cases the client contributes to the review agenda.

#### **7. Internal Auditing ESC Global Written Management Procedure 7**

Internal Audits are performed annually. Senior management look in detail at our Statement of Commitment and through all points to make sure we are achieving our commitment using evidence taken from site and staff audits as part of the overall company audit.

Data from our customer base and from our training and competence records related to our employees is extracted by means of asking pertinent questions to understand if matters have been completed. Any non-conformances are discussed in detail and actions put in place to rectify them.

The questions and answers are recorded on a separate sheet called Internal Audit Findings and Actions Arising sheet.

All action will be categorised (low, medium and high) with a time limit to rectify the issues.

There are currently 21 Questions covering the 9 commitments to the Code.

Customer evidence and field staff evidence are selected at random and are used to determine if ESC Global are conforming to the Statement of Compliance. Should there be a high degree of non-conformance found in the completion of an Internal Audit an extension of the customer base is selected if the non-conformance is apparent in the extended customer base then action sheets will be produced. All action will be categorised (low, medium and high) with a time limit to rectify the issues.

#### **8. Sub-Contractor Written Management Procedure 8**

ESC Global does not use any external sub-contractors at this stage. We are fortunate in being able to call upon the Environmental speciality Chemicals Group educated workforce across Europe. In the event a specific discipline is required we will employ them from those companies.

If we elect to sub contract externally any aspect of work in the future we will only employ those with the required formal recognised qualifications and those who subscribe and adhere to our values and principles.

The only current exception to this is the use of a UKAS recognised Laboratory – in the form of Alcontrol – to perform our water sample analysis and report.

ESC Global Ltd requests that all subcontractor used are to present their qualification and affiliations and notify ESC Global in writing any changes made.

#### **9. Distribution of The Code ESC Global Written Management Procedure 9**

On water hygiene quotations or contract states 'Our LCA certification and code of conduct can be found on our website [www.escglobal.co.uk](http://www.escglobal.co.uk)'

In all correspondence – when tendering, quoting and during further communication – we reference our affiliation to the LCA.

We ensure that each Registrant receives a copy of the LCA Code as follows:

We are in possession of the latest issue of the HSE Acop L8 [Approved Code and Practice and Guidance on Regulations 4<sup>th</sup> Edition published 2013 - the main sub section being the HSG 274 Part 2 – Hot and Cold Water Systems.

Additionally ESC Global is compliant to ISO 9001, 14001 and 18001and we can offer these certificates if required.