



Legionella Control Association 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.

1. Allocation of Responsibilities

- 1.1) Eurofins offer a full Legionella analysis and identification service only.
- 1.2) Eurofins do not offer any form of interpretation of the data that we provide.
- 1.3) Eurofins do not offer any form of sampling service, other than the collection of the samples from a site or an agreed location between Eurofins and our client.
- 1.4) Eurofins provide 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 notify all its clients of this via Service Level Agreements.

2. Training and Competence of Personnel

- 2.1) Training of all staff within the company will be conducted in accordance with the Quality Manual and for Water Microbiology in accordance with General 30.
- 2.2) All staff conducting Legionella analysis within the Water Microbiology Laboratories of Eurofins will have been trained in accordance with either of the In house Methods MW16 or MW19 or MW28 or Method 30.1, and other associated procedures, with regards to the analysis of Legionella. Any amendments to the methodology are updated and recorded in the relevant Section of the Training Record in and/or via a Memorandum.
- 2.3) The local staff training matrix is updated monthly to reflect changes in responsibilities, competency and personnel. The training record is updated and controlled by a senior member of staff within the laboratory.
- 2.4) All staff within the Laboratories who undertake Legionella Testing will be required to participate in the Laboratories Internal Quality Control Programme and in a suitable External Proficiency scheme (Quality in Water Microbiology Scheme, QWAS). The collated data is used to monitor on-going competence.
- 2.5) Eurofins do not offer assessment of our clients staff training needs.
- 2.6) Eurofins are pleased to offer a free technical seminar on the analysis of Legionella. This seminar details the obligations of Eurofins and of our clients from when the sample is taken to when the report is issued.
- 2.7) Eurofins keep 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) The training as detailed in Section 2, alongside internal audits of analysts work enable traceability of performance and analytical data.
- 3.2) Eurofins have 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.
- 3.3) The role of D4/NCW form is to capture the details of an anomaly that may result in corrective/preventative actions being undertaken.
- 3.4) 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.
- 3.5) 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

4. Communication with Management

- 4.1) Externally, any changes to the methodology, procedures or mechanisms that could affect the results of our clients are reported via our Eurofins Advantage client portal or Europortal. In addition an email is sent to all contacts within an organisation with details of the change.
- 4.2) The details on the portal are then stored within the Eurofins Advantage system or Europortal for clients records, the email is more of an update to our clients.
- 4.3) 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 and closed off.
- 4.4) 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.

- 4.5) The laboratory has 'Speak-up Policy' in place which covers the formal staged escalation procedure, as detailed in Legionella Control Association – Code of Conduct.
- 4.6) The laboratory operates to Procedure SOP350 which covers contract review, including the specific requirements for Legionella Control Association.

5. Record Keeping

- 5.1) It is the policy of Eurofins that all records are maintained for a period of at least 4 years, unless otherwise advised by the client. Records may be retained either as hardcopy or electronically, dependent on the means of generation.
- 5.2) All of the reports, invoices and schedules issued to / from Eurofins are recorded on an individual client Eurofins Advantage site **or Europortal** for an agreed period of time.
- 5.3) Access to Eurofins Advantage **or Europortal** is via the internet and a secure on-line connection. In order to access a client specific page the client will 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.
- 5.4) The number of users of Eurofins Advantage **or Europortal** for any one client is dictated by the client. It is the clients responsibility to ensure that only valid and active staff have access to their Eurofins Advantage **or Europortal** site.
- 5.5) In addition to Eurofins Advantage **or Europortal** certificates can be e-mailed directly to the client upon completion of the report with either a full or partial description with or without an attachment.
- 5.6) Access to Eurofins Advantage **or Europortal** is controlled by the Eurofins IT team and the client, both of whom have access to the administration pages. This level of access allows our clients to control what engineers have access to what parts of Eurofins Advantage **or Europortal**.
- 5.7) It is the responsibility of Eurofins to keep all reports and certificates on Eurofins Advantage **or Europortal** maintained and accessible; should there be any issues regarding access to data then the IT team are available via euportal@eurofins.com.
- 5.8) Where the client is responsible for submitting samples via the Eurofins Advantage **or Europortal** it is the responsibility of the client to ensure that the data is entered correctly and sufficiently
- 5.9) If a discrepancy is noted between the Sample Submission form, the registration file and the sample bottles then a member of the Eurofins team will contact the client to resolve any inconsistencies.

- 5.10) Data extracted from Eurofins Advantage or Europortal 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.
- 5.11) 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.

6. Reviews

- 6.1) In order for both parties to review the service provided by Eurofins we actively seek an annual meeting to discuss all aspects of the Service Level Agreement (SLA) review.
- 6.2) Topics covered during a routine SLA include the service of the lab, turnaround times, reporting issues, collection issues, invoicing issues, Eurofins Advantage or Europortal issues and any advancements that Eurofins have made that the client may not be fully utilizing that have occurred over the past 12 months. This is not an exhaustive list and a review may include other areas as appropriate
- 6.3) If any significant issues are raised at the SLA review then this will result in Non-Conformities being raised if appropriate and discussions with the lab being undertaken to resolve any issues.
- 6.4) The procedure for undertaking reviews is covered in SOP350. Minutes of meetings are recorded on Eurofins CRR Client Review Form and stored in Eurofins CRM system.

7. Internal Auditing

- 7.1) Eurofins carry out method reviews and audits to ensure that industry best practices are being undertaken throughout all of our facilities across the world.
- 7.2) When changes in standards are identified a method review occurs to identify any changes required to the existing methods.
- 7.3) Eurofins are UKAS accredited to ISO/IEC UKAS 17025:2005 each individual location is responsible for maintaining their individual accreditation. Each site is audited annually by a team of UKAS assessors who raise any improvements required by the lab.
- 7.4) Eurofins Water Hygiene Testing UK Limited - Wolverhampton (UKAS No. 9658) operates a multisite accreditation covering the Camberley and Livingston Facilities as satellite labs of Wolverhampton. Management is undertaken centrally from Wolverhampton. Eurofins Water Hygiene Testing UK Limited - Grimsby (UKAS No. 10203) operates as a separate laboratory, all locations operate to a corporate Quality Manual and Governing procedures. Where local deviations exist these are appropriately detailed.
- 7.5) Internal Audits are carried out in accordance with the 'Eurofins UK Audit Procedure'. The method reviews and audits are designed to highlight any

areas of method development or improvement that could be undertaken to ensure that we provide the best possible service to our clients.

- 7.6) If there are any nonconformances/corrective/improvement/preventive actions 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. The actions will be monitored via the D4 infonet system to ensure that they are closed out in a timely manner.

Audit findings are completed and tracked using the D4 Infonet system.

- 7.7) Any improvement actions raised at the UKAS visits are identified and addressed within the specified time frame.
- 7.8) Any findings raised at internal and external assessments are discussed at the regular quality meetings, to determine the impact of the findings.

8. Sub-contractors

- 8.1) If Eurofins cannot undertake Legionella analysis using any of the following UKAS accredited (in house) methods MW19 or MW16 or MW28 or Method 30.1, Eurofins will subcontract analysis to a laboratory which is both UKAS accredited and LCA registered.
- 8.2) The subcontract process is detailed in Section 4.5 of the Quality Manual.
- 8.3) If Eurofins cannot find a laboratory which is UKAS accredited and LCA registered for Legionella analysis, Eurofins will inform this to the client in writing prior to sub-contracting.

9. Distribution of the Code

- 9.1) Eurofins will publish any changes or amendments to the Code of Conduct on the Eurofins Advantage client portal or Europortal.
- 9.2) Eurofins will publish any changes for amendments to the Code of Conduct on the Eurofins website (<http://www.eurofins.co.uk/>) under the water hygiene testing page.
- 9.2) Any clients that cannot access the Eurofins website may request a copy of the latest Code of Conduct either by email or post.