

LCA Assessors are finding a wide variation in the content and format of internal audits completed by LCA Members in assessing how they match up to the nine Service Provider Commitments and Service Standards to which they have committed themselves through their Statement of Compliance (SoC). Internal audits by a Member should be carried out with the same degree of commitment as would be given to an external audit from the LCA and should examine a wider range of evidence to support compliance.

This document is intended to guide you in what the LCA Assessor is looking for when they assess your compliance with the internal audit section (Commitment No.7) of the Code of Conduct. We have also included an example internal audit and you may find it useful to work to this format (although this is not compulsory).

The underlying reason for internal auditing is to ensure that compliance with LCA commitments is being achieved in practice for a representative proportion of the LCA Member's legionella control output. Internal audits should be treated as a serious part of the LCA commitment and a poorly designed internal audit or an internal audit that pays lip service to the requirements may jeopardise your LCA membership.

LCA Members can complete internal audits using their own staff or can contract the task to an external auditor. The LCA Member retains overall responsibility for the internal audit process whoever completes the audit.

The two stages of the internal audit are:

1. To ensure that the SoC and procedures of the LCA Member are current and reflect the actual working practices of the LCA Member by auditing the SoC and processes
2. To ensure the procedures the LCA Member has in place are used day to day in the operation of the Member's legionella control activities by checking evidence to see that procedures have and are being followed

The first stage above should be done at least once per year and can be done in isolation of the second stage. Non-conformances found in the second stage must feed back into the first stage where applicable and lead to improvements in process or management, i.e. lessons must be learned from the internal audit.

The second stage needs to be applied to a representative proportion of the LCA Member's legionella control activity and can be done once per year or throughout the year on a rolling audit programme. Audits must be meaningful and supported by evidence. The evidence used must be clearly referenced and traceable should the LCA assessor wish to replicate the audit. If the LCA Member operates a quality management system, such as ISO9001, this process should be familiar.

The first stage of an internal audit is to test the SoC and related procedures. This stage should ask the following questions about each of the **first eight Service Provider Commitments:**

- Have the LCA Code of Conduct or LCA Service Standards been updated by the LCA since the last audit?
- Is there a procedure in place to cover this section and any updates?
- What is the procedure called or numbered?
- Is it referenced correctly in the Statement of Compliance?
- Does the procedure correctly describe the actions that are taken?
- Is the procedure still relevant or does it need updating due to change in work practices?

For the **ninth Service Provider Commitment (Distribution of the Code), your internal audit should ask:**

- Is there a mechanism in place to cover this section?
- Is it detailed in the Statement of Compliance?

- Does it ensure that all clients have access to current copies of the Code of Conduct and your LCA Certificate of Registration?

The second stage of an internal audit is to test the SoC and check that procedures are being used in practice and should take all of the points above and test them against evidence from customer files and records to see if they have been followed in practice. The number of contracts, jobs or clients you audit should be a representative sample of your legionella control business.

You may wish to use a risk based system to select a higher proportion or all of your high-risk work such as evaporative cooling or work in healthcare settings in addition to the general sample of contracts, jobs or clients.

There are other key factors that you **must include** in your internal audit. These relate to the way in which your internal audit is conducted:

- Internal audits should be conducted at least annually and a representative proportion of legionella control work should be selected at random and checked for evidence in the audit
- The internal audit document should be dated and contain the name and position of the person conducting the audit
- Contracts, jobs or clients to be audited should be selected at random from records
- A clear reference should be given to each of the documents audited and the evidence gathered so that the audit can be traced back
- Audits are expected to uncover non-conformances and where the audit reveals a non-conformance, the audit document should:
 - Detail what the non-conformance is
 - Indicate what action will be taken to correct the non-conformance
 - Who will be responsible for completing this action
 - The date by which completion is planned
 - Who will then verify that the action has been completed

Internal Audit

Date of Audit:

Auditor Name and Position:



Action needed/non-conformance

Advisory

Observation

Evidence Audit Observation/Comment

| 1. Allocation of responsibilities | | | Actions Required | |
|---|-------------------------------------|------------------------|--------------------|-------------|
| Service Provider Commitments The service provider will: | Review of procedures for compliance | Evidence of compliance | Person Responsible | Target Date |
| 1.1 Explain in detail the client's obligations under the legionella legislation. | | | | |
| 1.2 Identify those services covered by the contract and those which should be provided by the client to meet all current obligations. | | | | |
| 1.3 Formalise a written agreement detailing the respective responsibilities for each requirement. | | | | |
| 1.4 State in the written agreement that the service provider has LCA registration for the service categories being provided. | | | | |

Internal Audit

Date of Audit:

Auditor Name and Position:

| 2. Training and competence of personnel | | | Actions Required | |
|--|-------------------------------------|------------------------|--------------------|-------------|
| Service Provider Commitments The service provider will: | Review of procedures for compliance | Evidence of compliance | Person Responsible | Target Date |
| 2.1 Arrange formal training programmes for service provider personnel associated with the control of legionella bacteria. | | | | |
| 2.2 Have a system for assessing the competence of service provider staff, establishing their training needs and ensuring they are kept up to date with current best practice procedures. | | | | |
| 2.3 Assist the client to assess training needs of staff and then where requested advise as to how these can be met. | | | | |

Internal Audit

Date of Audit:

Auditor Name and Position:

| 3. Control measures | | | Actions Required | |
|--|-------------------------------------|------------------------|--------------------|-------------|
| Service Provider Commitments The service provider will: | Review of procedures for compliance | Evidence of compliance | Person Responsible | Target Date |
| 3.1 Have a management system to assess the requirements and ensure the appropriate programme of control measures is designed, implemented, monitored and maintained. | | | | |
| 3.2 Have a system for verifying that corrective and preventive actions are implemented. | | | | |
| 3.3 Ensure the programme of control measures satisfies as a minimum the LCA Standards for Service Delivery. | | | | |

Internal Audit

Date of Audit:

Auditor Name and Position:

| 4. Communication | | | Actions Required | |
|---|---|------------------------|--------------------|-------------|
| Service Provider Commitments The service provider will: | Review of procedures for compliance | Evidence of compliance | Person Responsible | Target Date |
| 4.1 Have management procedures to respond appropriately should the system operating conditions deviate from control criteria. | | | | |
| 4.2 Agree with the client how the service provider would communicate with the client's nominated personnel in the event of any necessary actions. | | | | |
| 4.3 Bring to the client's attention any significant matters affecting the control of legionella of which he has become aware, beyond the responsibilities of the contract. | | | | |
| 4.4 Have a formal staged escalation procedure to ensure that in the event of significant matters of concern that must be raised, these are escalated, as necessary, to the responsible person, the duty holder and, as a last resort, to the relevant enforcement agency. | New requirement for the 2018-2019 year. | | | |

Internal Audit

Date of Audit:

Auditor Name and Position:

| 5. Record keeping | | | Actions Required | |
|---|-------------------------------------|------------------------|--------------------|-------------|
| Service Provider Commitments The service provider will: | Review of procedures for compliance | Evidence of compliance | Person Responsible | Target Date |
| 5.1 Indicate which records should be kept by both parties and where they will be kept. | | | | |
| 5.2 Establish with the client who will be responsible for the maintenance of these records. | | | | |

Internal Audit

Date of Audit:

Auditor Name and Position:



| 6. Reviews | | | Actions Required | |
|--|-------------------------------------|------------------------|--------------------|-------------|
| Service Provider Commitments The service provider will: | Review of procedures for compliance | Evidence of compliance | Person Responsible | Target Date |
| 6.1 Establish a programme that will allow both parties to review formally, at least annually, all aspects of the agreement covering system management and the control of legionella. | | | | |

Internal Audit

Date of Audit:

Auditor Name and Position:

| 7. Internal Auditing | | | Actions Required | |
|---|-------------------------------------|------------------------|--------------------|-------------|
| Service Provider Commitments The service provider will: | Review of procedures for compliance | Evidence of compliance | Person Responsible | Target Date |
| 7.1 Have a management system to ensure that Service Provider compliance with each of these commitments is self-audited at least once a year and that a formal record is kept. | | | | |
| 7.2 Establish a corrective action programme so that any non-compliance identified is corrected in a timely manner. | | | | |

Internal Audit

Date of Audit:

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| 8. Sub-contractors | | | Actions Required | |
|---|-------------------------------------|------------------------|--------------------|-------------|
| Service Provider Commitments The service provider will: | Review of procedures for compliance | Evidence of compliance | Person Responsible | Target Date |
| 8.1 Have a management procedure to ensure that any sub-contractor holds an independent registration under the Code of Conduct; or | | | | |
| where a sub-contractor is not LCA registered, implement additional controls and audits to ensure that all activities carried out are compliant with the Code of Conduct and any relevant legislation; and | | | | |
| 8.2 regardless of whether the sub-contractor is LCA registered or not, implement procedures and checks as necessary to ensure that the competency of the sub-contract service provider is assessed in relation to the scope of service the sub-contractor is providing. | | | | |

Internal Audit

Date of Audit:

Auditor Name and Position:



| 9. Distribution of the Code | | | Actions Required | |
|---|-------------------------------------|------------------------|--------------------|-------------|
| Service Provider Commitments The service provider will: | Review of procedures for compliance | Evidence of compliance | Person Responsible | Target Date |
| 9.1 Have a management system to ensure all clients to whom services are provided, associated with the control of legionella, receive a copy of the Code of Conduct and Certificate of Registration or are informed that the current documents are available on their website. | | | | |

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| Total Number of actions on this internal audit Report: | |
| Total Number of advisories on this internal audit Report: | |
| Total Number of observations on this internal audit Report: | |
| Total Number of actions following evidence audit: | |

Internal Audit

Date of Audit:

Auditor Name and Position:



Summary of Assessment of Standards of Service Delivery from the LCA supplied checklists

| Service Standard | Non-conformances | Notes |
|------------------|------------------|-------|
| 1 | | |
| 2 | | |
| 3 | | |
| 4 | | |
| 5 | | |
| 6 | | |
| 7 | | |
| 8 | | |
| 9 | | |