Water Management Communication Procedure

1.1 Introduction

Medway Council understand that communications and management procedures are particularly important where several people are responsible for different aspects of the operational procedures.

Lines of communication will be clear, unambiguous, and audited regularly to ensure they are effective. This also applies to outside companies and consultants who may be responsible for certain parts of the control regime.

1.2 Scope

The scope of this procedure applies to:

* All appointed management.
* The independent consultant.
* The appointed risk assessing and water treatment contractors.

1.3 Internal and External Communication for Performance Escalation

Where non-conformances are transmitted to the contractor and no action is consistent by the contractor the procedure for performance escalation:

Stage 1 – Escalation to Responsible Person and Independ Consultant

In the event of three non-conformances a report is sent to the Responsible Person and appointed consultant identifying the concerns, with recommended remedial actions and a timescale for completion. In the event these are not acted upon, or there is no plan to remediate the issues stage 2 below applies.

Stage 2 – Escalation to Duty Holder

A report is sent to the Duty Holder identifying the concerns, with recommended remedial actions and a timescale for completion. This formally outlines the concerns and seeks a commitment to act. In the event these are not acted upon, or there is no plan to remediate the issues stage 3 below applies.

Stage 3 – Report to the Regulator

If after formal escalation of the issue as stage 1 & 2 above and they still continue to ignore the problem, Medway Council will seek legal advice on a client who won’t act if we deem the issue to be a significant risk.

1.4 Internal and External Communication for Legionella Risk Assessment

The contractor will be informed by the specification on the contract that all completed legionella risk assessments will be sent to the contractor via email or the portal. The deputy responsible person will review all legionella risk assessments. From the identified findings and conclusion, the deputy responsible person will implement all non-conformances on to a programme tracker and send it to the responsible person via email for approval. Once approved, the responsible person will confirm the remedial works by responding to the initial email. Any questions raised by the responsible person will be directly emailed to the deputy responsible person. The deputy responsible person will then contact the contractor via email for clarification. This will then be forward to the independent consultant for review. The independent consultant will either call the deputy responsible person or book in a meeting, this will then be followed up with an email

In the email sent by the deputy responsible person specifying the remedial programme tracker the contractor will be instructed by the to respond to the email informing that the advised timescale is suitable for the contractor to complete. Any issues with the appointed timescale will be escalated to the responsible person via a phone call from the deputy responsible person and followed up with an email. The appointed independent consultant will audit a percentage of the completed remedials, the final conclusion will be sent to the deputy responsible person via email and followed up with a meeting.

1.5 Water Safety Meetings

There will be a Quarterly meeting with the appointed contractor to discuss the key performance indicators to determine whether all control measures identified in the written scheme have been completed at the appointed sites. The independent consultant will attend all meetings to ensure that there is integrity and fair presentation from the contractor and that an effective programme is implemented for appointed tasks.

Non-conformances from the control measure findings will be discussed, to detect whether risks that have been identified by the contractor are being escalated to the relevant person(s) and being put on a programme to be rectified in a safe, timely manner.

Details, outcomes, and actions agreed in these meetings are to be recorded in writing and circulated to the various operational functions of Medway Council. The non-conformances identified in the meeting will be noted and reviewed for the next meeting. If the contractor is failing to fulfil the requirements Medway Council will follow the escalation procedure for failure to provide.

1.6 Appointment of Management, Escalation and Communication for Identified Non-conformances and Control Regime Reports

Duty Holder

**Name:** Mark Breathwick

**Position:** Head of Housing Services

**Email:** [mark.breathwick@medway.gov.uk](mailto:mark.breathwick@medway.gov.uk)

**Telephone Number:** 01634 333540

**Stage 4**

Any issues with the appointed timescale will be escalated to the responsible person via a phone call from the deputy responsible person and followed up with an email. Where non-conformances are transmitted to the contractor and no action is consistent the responsible person will follow the escalation process in section 1.3.

**Stage 3**

Where non-conformances are transmitted to the contractor and no action is consistent by the contractor the procedure for performance escalation will below follow and enforced.

Responsible Person

**Name:** Adam Spokes

**Position:** Senior Development and Property Services Manager

**Email:** [adam.spokes@medway.gov.uk](mailto:adam.spokes@medway.gov.uk)

**Telephone Number:** 01634 333582

**Stage 2**

The deputy responsible person will review the control measure task reports and non-conformances on a monthly basis. From the identified thermal control findings, the deputy responsible person will implement all non-conformances on to a programme tracker.

The non-conformances will be evaluated by the deputy responsible person with the assistance of the independent consultant. The risk remedial works will be put into a programme tracker. The programme tracker will then be sent to the contractor by email on a monthly basis which will be the month after the reports have been sent by an email. In the same email the contractor will be instructed by the deputy responsible person to respond to the email informing that the appointed timescale is suitable for the contractor to complete.

Independent Consultant

**Name:**

Femi Sanyaolu

**Position:**

PCM Water Consultant

**Email:**

[fsanyaolu@pcm.co.com](mailto:fsanyaolu@pcm.co.com)

**Telephone Number:**

07966528992

Deputy Responsible Person

**Name:**

Lee Deacon

**Position:**

HRA Contracts Manager

**Email:**

[lee.deacon@medway.gov.uk](mailto:lee.deacon@medway.gov.uk)

**Telephone Number:**

01634 333744

Appointed Scheme Manager

**Name:**

Adrian Armour

**Position:**

HRA Compliance Project Manager

**Email:**

[adrian.armour@medway.gov.uk](mailto:adrian.armour@medway.gov.uk)

**Telephone Number:**

07800507431

Water Treatment Contractor

**Name:**

Lee Auston

**Position:**

Envirocure Director

**Email:**

[laustin@envirocure.co.uk](mailto:laustin@envirocure.co.uk)

**Number:**

01474 560630

**Stage 1**

The water treatment contractor will be informed by the specification on the contract that all control regime reports will be filed for easy access for Medway Council to access. All non-conformances will be escalated to the Deputy Responsible Person via an email. Urgent risks will be escalated by a phone call then followed by an email. The contract will be informed by the specification in the contract that sites that have been missed will be sent to the deputy responsible person by email with information to why the site control measures haven’t been completed.

All scheme managers will be informed via email on an annual basis or on induction of the new position that areas of non-conformance are to be escalated their appointed scheme manager who will directly forward the email to the Deputy Responsible Person.

1.7 Communication to Tenants

The deputy responsible person will inform tenants of the potential risk of exposure to legionella and its consequences and advise on any actions arising from the findings of the risk assessment, where appropriate. This will be sent on on an annual basis via a digital memo, letter, website information.

Tenants be advised via a digital memo, letter, website information to inform the landlord if the hot water is not heating properly or if there are any other problems with the system, so that appropriate action can be taken.

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