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| **TITLE***Name / description of the issue being assessed* | Water Management Plan and Policy |
| **DATE** *Date the DIA is completed* | 10th August 2020Updated 16th December 2020 |
| **LEAD OFFICER***Name, title and dept of person responsible for carrying out the DIA*. | Aisling Sims – Policy and Partnerships Manager |
| 1. **Summary description of the proposed change**
* *What is the change to policy / service / new project that is being proposed?*
* *How does it compare with the current situation?*
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| Housing services are planning to write and implement a new water management plan and policy. The water management plan and policy will detail the approach that will be adopted by Medway Council with regard to the day to day management of water and the risks associated with Legionella bacteria within the council housing stock and any sites of operation which fall under the responsibility of the Housing Revenue Account. Housing Services maintains and repairs the council’s domestic premises in accordance with current legislation, ensuring all statutory duties are met.To meet the aims of current legislation and guidance the Water Management Plan and Policy will: * Assign specific responsibility for managing water risks in Medway’s housing stock;
* Establish the processes for minimising risks associated with Legionella bacteria.
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| 1. **Summary of evidence used to support this assessment**
* *Eg: Feedback from consultation, performance information, service user records etc.*
* *Eg: Comparison of service user profile with Medway Community Profile*
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| The proposed plan and policy would ensure that employees, residents, visitors, service users, contractors and members of the public can use our buildings and facilities safely. This extends to ensuring that they are safe from risks associated with Legionella bacteria. In accordance with the Health & Safety at Work Act 1974 and The Control of Substances Hazardous to Health Regulations 2002, Medway Council is committed to the protection of all service users from exposure to Legionella bacterium. Therefore, Medway Council has adopted, as far as is reasonably practicable, the principles of control and management identified in the Health & Safety Executive’s Approved Code of Practice and Guidance Document L8 “The control of Legionella bacteria in water systems.” Medway Council recognises their responsibility to implement in full, all requirements described in current relevant guidelines and legislation relating to the management and control of Legionellosis including Legionnaires’ Disease, particularly, the Health and Safety Executive's Approved Code of Practice – L8 and HSG 274 guidance documents.As of August 2020, Housing Services owns 2991 properties in Medway and manages 216 leaseholders.Owned properties can be broken down in to the following property types:

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| Property type | Number of units |
| Bungalows | 272 |
| Flats | 1185 |
| Houses | 1248 |
| Sheltered units | 286 |

Those currently identified with higher priority are sheltered units and flats with houses and bungalows following as category B.A draft version of the plan and policy was published on the website for one month from 7 November 2020 and copies made available to HFIL tenant reps. There was once response received during the consultation period around the communication of issues to residents and this will be addressed within the final version of the document.  |
| What is the likely impact of the proposed change?*Is it likely to :** *Adversely impact on one or more of the protected characteristic groups?*
* *Advance equality of opportunity for one or more of the protected characteristic groups?*
* *Foster good relations between people who share a protected characteristic and those who don’t?*
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| **Protected characteristic groups** | **Adverse impact** | **Advance equality** | **Foster good relations** |
| **Age**  |  |  | ***✓*** |
| **Disabilty** |  |  |  |
| **Gender reassignment**  |  |  |  |
| **Marriage/civil partnership** |  |  |  |
| **Pregnancy/maternity** |  |  |  |
| **Race** |  |  |  |
| Religion/belief |  |  |  |
| **Sex** |  |  |  |
| **Sexual orientation** |  |  |  |
| **Other (eg low income groups)** | ***✓*** |  |  |
| 1. **Summary of the likely impacts**
* *Who will be affected?*
* *How will they be affected?*
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| This policy will be applied to all residents equally, but whilst not specifically targeted at any protected characteristic it is recognised that some aspects of could adversely impact on some of the groups. Leaseholders may be recharged for assessments and/or works arising from the implementation of the Water Management Plan and needs to be considered as part of any procurement projects. The implementation of a water management plan and policy may foster good relations with older residents in homes for independent living schemes and those that live in blocks with shared water services. These are priority dwelling types and will be subject to more frequent assessments in the proactive approach to managing water systems.Some groups who are unable to read written English can initially be disadvantaged, if material is not available in the appropriate format. |
| 1. **What actions can be taken to mitigate likely adverse impacts, improve equality of opportunity or foster good relations?**
* *Are there alternative providers?*
* *What alternative ways can the Council provide the service?*
* *Can demand for services be managed differently?*
 |
| If recharges are made, leaseholders will be consulted with as necessary and as with any other leasehold charges various payment options will be available. This will also be considered during the procurement process. Information needs to be provided to residents around water management and general tips for good practice around the home. All materials need to be clear, accessible and provided through a range of channels. Staff and relevant contractors should be made aware of the water management procedures and the ability to access risk assessments/findings if required.  |
| Action plan* *Actions to mitigate adverse impact, improve equality of opportunity or foster good relations and/or obtain new evidence*
 |
| **Action** | **Lead** | **Deadline or review date** |
| Ensure that responsible persons receive appropriate training | Head of Housing | September 2020 |
| Develop a plan for communicating the policy to residents and promoting good water management in the home for example shower descaling, tap descaling, flushing unused outlets.  | Property, Finance and Compliance Manager | December 2020 |
| Provide information to relevant staff and contractors around assessment/testing programme | Property, Finance and Compliance Manager | December 2020 |
| Consider the financial impact of water management on leaseholders and consult as necessary | Property, Finance and Compliance Manager | December 2020 |
| Recommendation*The recommendation by the lead officer should be stated below. This may be:** *to proceed with the change, implementing the Action Plan if appropriate*
* *consider alternatives*
* *gather further evidence*

*If the recommendation is to proceed with the change and there are no actions that can be taken to mitigate likely adverse impact, it is important to state why.* |
| To publish and implement a Water Management Plan and Policy.  |
| Authorisation *The authorising officer is consenting that:** *the recommendation can be implemented*
* *sufficient evidence has been obtained and appropriate mitigation is planned*
* *the Action Plan will be incorporated into the relevant Service Plan and monitored*
 |
| **Authorising Officer** | **Mark Breathwick****Head of Housing** |
| **Date**  | **August 2020** |