Audit Report Update - Housing Services

Ref	Recommendation	Section	Finding	Risk Rating	Original completion date	Current status	Revised Date for completion	Previous update	Current update	Responsible Manager
May-17										
1										
	a	All	Training is provided to relevant staff on Housing Fraud identification.	High	Dec-17	Complete		There has been a delay in implementing a tenancy audit protocol due to the significant staff resources that would require an annual tenancy audit. However, interim measures are in place for tenancy checks for tenants that (a) require a transfer (b) amendment to tenancy (c) are in significant credit balances and (d) in rent arrears that require a home visit. A UDC has been created on Orchard to identify when a tenancy audit has been completed and reports can be generated in order to monitor the number of audits that have been carried out.	Mandatory fraud identification risk training held on the 26th September 17 for all Housing Staff	**NM/SDM**
	b	Housing Options/ Tenancy Services	Protocols for tenancy audit checks on tenant are determined, to include secure tenants.	High	Dec-17	Complete			Interim measures are in place (as b), further discussion is required with BDO due to the significant staff resources required for an annual tenancy check.	**NM/SDM**
	c	Housing Options/ Tenancy Services	Photographs are obtained to idenfity all tenants	High	Dec-17	Complete			Photographs are obtained for any tenancy change request, new applicants, transfer applicants, mutual exchanges.	**NM/SDM**
	d	Housing Options/ Tenancy Services	Consideration is given to using photographs held for periodic verification of all tenants. This may require consideration of the scope of contracts and data sharing protocols (see also page 19 regarding Fair Processing Notices)	High	Dec-17	In progress	TBC		Under review corporately	**NM/SDM**
	e	Housing Options/ Tenancy Services	The Housing Team and the Fraud officers agree protocols for investigation which ensure potential fraud investigations are overseen by a suitably trained person	High	Dec-17	Complete			All potential fraud cases identified are referred to Fraud for further investigation	**NM/SDM**
	f	Housing Options/ Tenancy Services	Housing staff are reminded of the requirements of the Regulation of Investigatory Powers Act in relation to survelliance and investigation activity.	High	Dec-17	Complete			Staff advised of activities that fall within RIPA. Staff request authorisation and refer to Fraud	**NM/SDM**
	g	Housing Options/ Tenancy Services	Protocols for checking and copying identify documents are established.	High	Dec-17	In progress	Oct-18		Identity Protocol drafted and being reviewed for compliance across service teams	**NM/SDM**
2	a	Repairs	Written procedures are prepared to define protocols and procedures for Compliance checks	High	Apr-18	In progress	TBC	(A) Following completion of the external review of gas and asbestos, a fire management review has been conducted and a fire management policy is due to be presented to the C, H &H committee on the 3/7/18. (B) In progress - The external review of our gas compliance procedures has bene completed and was found to be robust and appropriate. The external consultants are confirmed to be appointment for 1 month in-house to carry out further reviews and upskill key staff. (C) Complete, (D) complete, (E) in progress. The data cleansing is ongoing, further configeration/upgrade to keystone is required which has been authorised. Staff resource is being provided under managed repairs service with Basildon BC. (F) Complete, (H) complete	Fire Management Policy approved at C, H & H committee	**RB/NM**
	b	Repairs	Contractural arrangements for provision of gas and electrical checks are reviewed to establish independence between provision of checks and remedial works.	High		In progress			As previous update	**RB/NM**
	c	Repairs	In the absence of direct access to contractor systems by the Council, Contractors are required to provide copies of all current gas and electricalsafety certificates	High		Complete			As March update - hard copies of documents are now received	**RB/NM**
	d	Repairs	Effective contract management is undertaken to ensure the contractors provide interfaces enabling Council access to systems and certificates as required by the contract.	High		Complete			As March update - Both contracts end in June 19 and a direct interface is no longer a viable option. Procurement of the new contract is underway and proposal is to use the incoming contractor system thereby not requiring an interface. Wates & Oakray provide regular information and on request	**RB/NM**
	e	Repairs	The housing management system is used for recording information relating to Compliance checks	High		Complete			The keystone system is now live and fully functional	**RB/NM**
	f	Repairs	Training is provided as required to ensure officers are able to maximise use of the housing management system.	High		Complete			Provided in accordance with the managed service provided by Basildon BC	**RB/NM**
	g	Repairs	Consideration is given to the inclusion of requirements for contractor provision of exception reporting on pending and overdue Compliance checks in future contracts.	High		Complete			As March update - We are currently undergoing the procurement exercise for the new R&M contract. Requirements for contractor provision of exception reporting on pending an doverdue compliance checks are included in the tender documents.	**RB/NM**

	h	Tenancy Services	The Council determines arrangements for notifying the contractor of any sold properties for which compliance checks are no longer the Council's responsibility and for charging leaseholders where the Council retains any residual responsibility for these checks.	High		Complete			As March update - An automated housing asset list is issued to both contractors on a monthly basis. In addition the RTB Officer also notifies both contractors when a property is subject to RTB and then sold.	**RB/NM**
	i	Repairs	Risk assessments are carried out and recorded to ensure fire safety checks on blocks are scheduled at appropriate intervals.	HIgh		In progress	Dec-18		Risk assessments for all high rise blocks and sheltered stock now complete. A programme of risk assessments for communal areas are now currently in progress. A Safety 1st programme is being prepared for 18/19.	**RB/NM**
	j	Repairs	Asbestos checks are carried out on all properties and records retained of the checks.	High		Complete			A 3 year programme for asbestos checks for all council properties is currently being prepared	**RB/NM**
	k	Repairs	The Council ensures that water risk assessments are carried out as required and that records are maintained of these checks for all housing types.	High		In progress	Dec-18		Water risk assessments are carried out on sheltered accommodation on a weekly basis. Water tanks have been identified at all flatted accommodation and a programme of inspections are due to begin	**RB/NM**
3	a	Repairs	Methods used to ensure contractor compliance with contract performance requirements, including completion and submission of information, should be strengthened. Such arrangements should also include penalty clauses for non-compliance	High	Apr-18	In progress	Ongoing	We now have a managed repairs service with Basildon BC, who have responsibility for all aspects of contract management. Interim arrangements have been made until the new Brentwood team are in place who will be employed by Basildon BC anticipated for September 18. We also have addtional staffing resources based at Basildon provided, which include Asset Managmeent, Compliance Management and I.T resources.	Progress being made on the Managed Repairs Service as advised in the Repairs report referred to Sept C, H & H committee	Progress being made on the Managed Repairs Service as advised in the Repairs report referred to Sept C, H & H committee
	b	Repairs	Effective, robust contract management arrangements are determined for Housing. Retention of documentation of contract management activity. Contractor performance and provision of performance information in accordance with the contract, including records of agreed action to resolve performance issues. Contractor provision of I.T interfaces and other contractual requirements in accordance with the contract. Where changes in contract provision are agreed by the Council, these are formally approved via the issue of Variation orders. Submission to the housing team of evidence in checks where they are required to be made by the Contractor. Requirements for the contractor to provide evidence of compliance with key contract requirements. Contract pricing protocols applied.	High	Apr-18	In progress	Ongoing		Progress being made on the Managed Repairs Service as advised in the Repairs report referred to Sept C, H & H committee	Progress being made on the Managed Repairs Service as advised in the Repairs report referred to Sept C, H & H committee
	c	Repairs	Payments to contractors should reflect the extent of provision of service against the agreed contract terms.	High		Complete			All payments are checked an authorised by the Repairs/Project Managers	Progress being made on the Managed Repairs Service as advised in the Repairs report referred to Sept C, H & H committee
	d	Repairs	Benchmarking of rates and uplifts is undertaken and where appropriate consideration is given to contract options (including negotiation or termination.)	High		In progress			Both contractors notified of Keegans being engaged to undertake an open book review	
4	a	Housing Options/ Tenancy Services	Pre-tenancy and in-tenancy check policies are established which include protocols to address tenancy fraud risks (covering application, subletting, succession, key selling, right to buy and right to acquire fraud), and which ensure compliance with Data Protection Act requirements.	Medium		Complete		Pre- tenancy checks are already in place and have recently been revised to include additional I.D checks. These new protocols have also been incorporated into other tenancy areas. Existing policies & procedures have been re-drafted and circulated to all staff	NA	**AA/NM**
	b	Housing Options/ Tenancy Services	Policies are communicated to staff, tenants and any delivery partners	Medium		Complete			As previous update	**AA/NM**

5	a	Tenancy Services	Arrears reporting is developed to include the age of debts, the cases at each key stage of recovery and additional management information is provided accordingly.	Medium	Oct 17	In progress	Oct-18	Debt Recovery Officer recruited who will have responsibility for developing and implementing processes around former tenant debts.	As previous update and 5b (below)	NM
	b	Tenancy Services	Management determine recovery protocols (to recover or write off former tenant arrears). This decision should be supported by additional management information on age of debts and action already taken and consideration could also be given to check against Council tax records or credit checks to enable tracing of former tenants.	Medium		In progress	Sep-18		Former Tenant Debt recovery policy drafted. Referred to September C, H & H committee for approval	NM
	c	Tenancy Services	The impact of delays in processing benefit claims and changes in circumstances is identifield and where appropriate raised with the service provider.	Medium		Complete			With the introduction of Full Service Universal credit, as we now have a shared Revs&Bens service we have priority for access to the LA portal	NM
6	a	Tenancy Services	Right to Buy information is input to and managed via the Housing Management System, removing the need for duplication of infput to a spreadsheet.	Medium	Oct 17	In progress	Oct-18		Working towards full compliance	NM
	b	Tenancy Services	Access permissions to the Housing Management system are reviewed to enable appropriate staff to identify the status of applications.	Medium		Complete			n/a	NM
7	a	Tenancy Services	Consideration is given to performing checks on previous Right to Buy applications to verify the applicant's entitlement to the Right to Buy discount.	Medium	Oct 17	Complete		Checks in process as recommended. All RTB applications are referred to the Council's Fraud Officer when submitted in order to assist in the prevention of fraudulent applications.	n/a	AA/NM
8	a	Repairs	Update the contract with the contracted surveyor visiting the property to record improvements made by the tenant, so that they undertake initial identity checks as part of this visit and report back their findings to the housing team.	Medium	Sept 17	Complete		The Council has recently appointed external surveyors/valuers which will also carry out RTB valuations/surveys	The Council's Fraud Officer carries out home visits for every RTB application and carries our the I.D checks	AA/NM
9	a	Tenancy Services/ Leasehold	Leaseholder agreement storage is reviewed to ensure records including leaseholder agreements are retained for all properties.	Medium	April 18	In progress	Oct-18	Revised services charges - complete. In progress - Leaseholder module. The old version of the leaseholder module on Orchard will be deactivated w/b 18/6/18 Additional upgrading of the system will be included with the work that is currently underway with ICT which will create addiitonal benefits to the module. A new arrears reporting suystem has been created which is automatically generated, which allows us to quickly highlight arrears cases.	Working towards full compliance	AA/NM
	b	Tenancy Services/ Leasehold	Errors in data upload of estimated service charges to the Housing Management system are corrected and tenants reimbursed where overpayments have occurred.	Medium		In progress	Oct-18		Working towards full compliance	AA/NM
	c	Tenancy Services/ Leasehold	Where adjustments are made to leaseholder service charges, these are identified clearly in all records to ensure transparency and enable reconciliation.	Medium		In progress	Oct-18		Working towards full compliance	AA/NM
	d	Tenancy Services/ Leasehold	The spreadsheet maintained to determine apportionmanet of service charges to be invoiced to leaseholders is extended to include all properties to enable confirmation that tenants and leaseholders recharges are equivalent and that recharges equate to actual costs, and these reconcilations are performed on a regular basis.	Medium		In progress	Oct-18		Working towards full compliance	AA/NM
	e	Tenancy Services/ Leasehold	Costs relating to respnsive repairs which would not be permitted to be recharged to leaseholders are removed from the calculation determining the total to be apportioned across properties.	Medium		In progress	Oct-18		Working towards full compliance	AA/NM
	f	Tenancy Services/ Leasehold	A Policy is maintained to enable determination of appropriate management service charges for apportionment	Medium		Complete			Service charge policy approved at September 17 committee	AA/NM
	g	Tenancy Services/ Leasehold	Any adjustments required to service charges should be applied promptly to ensure accuracy of records and transparency of charging.	Medium		In progress	Oct-18		Working towards full compliance	AA/NM
10	a	Repairs	The Council reviews the scope of the compliance manager role and essential qualifications required to perform this role.	Medium	Apr-18	Complete		The BBC's Contracts Administrator reviews all requests for day to day repairs works exceeding £250.	Compliancy Management is now provided by Basildon BC and external consultants.	RB/NM

	b	Repairs	Clear records are maintained of all surveys and inspections carried out, and these are retained in an accessible form (Such as on the Housing Management System)	Medium		Complete			All documents are now retained on the Keystone system	**RB/NM**
	c	Repairs	Where queries are raised for entried made on an EICR a process is developed to ensure they are followed up (and either the work or alternative work is commissioned, or the item is recorded as determined to be not required).	Medium		Complete			Compliancy Management is now provided by Basildon BC and external consultants.	**RB/NM**
11	a	All	Enhance the Fair Processing Notice for matters relevant to the administration of social housing.	Low	Sep-17	In progress	Oct-18	The draft 'Fair Processing' statement has been drafted and is awaiting corporate approval	The draft 'Fair Processing' statement has been drafted and is awaiting corporate approval.	**AA/SDM**
12	a	Tenancy Services/ Leasehold	Right to buy information and application forms are made available for download via the Council's website. Further efficiency could also be gained through integration between submited applicaions and the Housing Management systems.	Low	Nov-17	Complete		The website page has been updated and a PDF form is available to download on line for tenants.	n/a	**AA/NM**

Nov-17										
1	a	All	Introduce robust information and records management in accordance with ICO guidance, including development of records management, policy covering retention, security, destruction, and data protection.	High	Aug 18	In progress	Dec-18	DMS system live, new records are held electronically, HPA2 live which is the homelessness module on Locata. Housing register module went live on 4/6/18, documents received in paper form are scanned onto relevant I.T system an destroyed.	Currently under wider corporate review	AA/SDM
	b	All	Identify the Housing records to be maintained and retention periods, and review arrangements for their storage and retrieval - consider use of the Housing DMS or a Corporate alternative supporting customer relationship management. Refer to Retention guidelines for Local Authorities and policies adopted by other Local Authorities).	High		In progress			Retention periods for documents are currently being reviewed as part of the wider corporate review	AA/SDM
	c	All	Provide training and generally raise staff awareness of the Data Protection Act and the General Data Proection Regulations, In particular ensure staff do not record opinions, and that records contain appropriate information.	High	Aug 18	Complete		All Staff have completed mandatory GDPR training	n/a	AA/SDM
2	a	Tenancy Services	Develop an Estate Management Strategy and procedure	High	April 18	Complete		Estate Management Strategy approved at March committee. Inspections carried out every 6 weeks, which are reviewed at the following inspection. The HM and H&S Manager will be considering the use of an alternative I.T solution for inspections/monitoring by the use of an app based Housemark system and Keystone.	n/a	AA/NM
	b	Tenancy Services	Determine Estate Management inspection protocols and arry out inspections accordingly	High	April 18	Complete			n/a	AA/NM
	c	Tenancy Services	Train Housing Staff to conduct Estate Management inspections	High	April 18	Complete			n/a	AA/NM
	d	Tenancy Services	Prepare checklists to support Housing Staff conducting inspections (including for first day of tenancy (such as ensuring a working fire alarm) and for ongoing checks	High	April 18	Complete			n/a	AA/NM
	e	Tenancy Services	Consider use of technology to improve recording of issues identified, sharing data as appropriate, and monitoring of resolution	High	April 18	In progress	TBC		Working towards compliance	AA/NM
	f	Tenancy Services	Develop reporting arrangements for other Council staff already working in the borough to report estates issues	High	April 18	Complete			n/a	AA/NM
3	a	Housing Strategy	A working protocol is agreed between the Housing Team and the Asset team to enable an approach reflecting the needs of both teams, and providing clarity on the impact of actions by teams on other areas of the Council's operations	Medium	Sept 18	In progress		The asset review is still ongoing. The keystone configuration has been completed and a data cleansing exercise is ongoing. Further IT configuration is required, and a staff resource has been identified to carry out this work.	Working towards compliance	AA/NM/VP
	b	Housing Strategy	Determine the rules of Council land and property assets are to be allocated between the HRA and the General Fund	Medium	Sept 18	In progress			Working towards compliance	AA/NM/VP

	c	Housing Strategy	Review all Council land and property assest are to be allocated in accordance with above.	Medium		In progress		Currently under wider corporate review	AA/NM/VP
	d	Housing Strategy	Review options for maintenance of Asset related records, to determine feasibility of implementing a combined system, or links between systems to enable efficient update of records	Medium		Complete		Working towards compliance	AA/NM/VP
	e	Housing Strategy	Build resilience by ensuring the Assets system records are capable of being accessed by more than one member of staff. If access issues relate to the system no longer being supported or incompatible with current Council technology, an alternative system should be sought (in line with (d)).	Medium		Complete		Working towards compliance	AA/NM/VP
	f	Housing Strategy	If records continue to be maintained separately, ensure there is a regular check between the Assets team records and the Housing system	Medium		Complete		n/a	AA/NM/VP
	g	Tenancy Services/ Leasehold	Until the Council has assurance over the accuracy of records of Right to Buy properties, additional cross checks are made from the Finance records of Right to Buy income or property purchases to the Housing asset records on the Orchard system	Medium		In progress		Working towards compliance	AA/NM/VP
4	a	Repairs	Define parameters and protocols for cyclical and responsive repairs and replacement, and implement a programme and inspection regime reflecting these protocols	Medium	Sept 18	In progress	Managed repair service now live. Keystone information is currently being data cleansed and system updgraded to provide future programmes. Interim measures now in place to develop work programmes and appropriate Basildon staff in place. A number of reviews have been carried out which include gas , asbestos and fire management. The review for legionella is about to commence. From the reviews carried out to date, these have informed the preparation of work programmes where compliancy is the immediate priority.	Ongoing cross-departmental work	Sue White (Risk and Insurnace officer)
	b	Repairs	Develop system reports to reflect defined protocols.	Medium	Sept 18	In progress		Ongoing cross-departmental work	Kim Anderson (Partnership Leisure and Funding Manager)
	c	Repairs	Ensure remaining Stock Condition Survey information is received and uploaded, and reports produced as finined in (a)	Medium	Sept 18	Complete		N/A	NM/RB/VP
	d	Repairs	Agree timetable with contractors to resolve issues relating to links between the Council and Contractor systems to ensure the Council has current information on works completed	Medium	Sept 18	Complete		N/A	N/A
	e	Repairs	Develop processes for monitoring against protocols for cyclical and responsive repairs.	Medium	Sept 18	Complete		N/A	
5	a	Tenancy Services	Review the corporate ASB strategy to ensure it remains appropriate and up to date, and provides clarity for staff on the protocols for managing ASBs including addressing the source issues such as through Housing Estates Management.	Medium	Sept 18	In progress	All ASB issues that are estate or tenancy related are referred to the ASB Officer (secondment), these are investigated jointly with the Housing Officers/Manager.	Ongoing cross-departmental work	NM/TL
	b	Tenancy Services	Link the ASB strategy on the Council's website to the Community Safety and Housing team pages	Medium	Sept 18	In progress		Ongoing cross-departmental work	NM/TL
	c	Tenancy Services	Consider use of a system (such as the Uniform system) for the recording of ASBs, and develop linking of ASB and Housing system data to enable reporting on tenancy issues and ASBs to facilitate improved management of the source of issues.	Medium	Sept 18	In progress		Ongoing cross-departmental work	NM/TL
6	a	All	Add indicators to the Housing Management system to clearly flag vulnerable tenants and those for whom Power of Attorney is inacted.	Medium	Jan 18	Complete	Complete	n/a	AA/NM/VP
	b	Tenancy Services/ Housing Options	Where Power of Attorney has been enacted, correspondence name fields on the Housing system are addressed to XX PoA for YY.	Medium	Jan 18	Complete		n/a	AA/NM/VP

7	a	Tenancy Services	Automate the process of uploading All Pay payments to the cash receipting system.	Medium	Sept 18	Complete		Complete	n/a	AA/NM/VP
8	a	Tenancy Services	Housing staff are informed that accounts in credit are a potential indicator of fraud.	Medium	April 18	Complete		Complete	n/a	AA/NM/VP
	b	Tenancy Services	Periodic checks are made on credit accounts by Housing staff, giving consideration to fraud risks.	Medium	April 18	Complete		Complete	n/a	AA/NM/VP
	c	Tenancy Services	The process for transferring credits is reviewed to identify options for efficiency through automation and streamlining.	Medium	April 18	Complete		Complete	n/a	AA/NM/VP
9	a	Tenancy Services	The Housing team document the regular reports run from the Housing system, identifying the recipient(s), to ensure checks and provision of management information is continued following the departure of the officer currently running these reports	Low	Jan 18	Complete		Complete	n/a	AA/NM/VP