Audit Report Update - Housing Services

Ref	Recommendation	Section	Finding	Risk Rating	Original completion date	Current status	Revised Date for completion	September 2018 Update	November 2018 Update	March 2019 Update	Responsible Manager
May-17											
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	a	All	Training is provided to relevant staff on Housing Fraud identification.	High	Dec-17	Complete		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	Complete	TBC	Under review corporately	Intellectual Governance Group (corporate level) is working towards resolving these items.	Fair Processing Notices/Privacy Notices have been adopted. Photographs held through Housing Register application process.	**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	Complete	Oct-18	Identity Protocol drafted and being reviewed for compliance across service teams	ID Protocol adopted		**NM/SDM**
2	a	Repairs	Written procedures are prepared to define protocols and procedures for Compliance checks	High	Apr-18	In progress	Jun-19	Fire Management Policy approved at C, H & H committee	Policies for Gas, Asbestos, Water and Electric are in the research stage and will be progressed by the housing Department.	Gas, Asbestos and Water Policies are now being drafted to be submitted to September 2019 Committee.	**KP/NM**
	b	Repairs	Contractual 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	Managed Repairs service still being implemented	Included in current mobilisation of the new R&M contract. Once implemented on the 4th June this will be complete.	**KP/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 subiect 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		Complete		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.	All checks now complete with Management Plan completed for Safety First programme.		**RB/NM**

#		Service	Description	Priority	Date	Status	Date2	Progress	Update	Update2	Owner
	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		Complete		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	Oakray contracted to undertake regular checks.		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	Progress made on the Managed Repairs Service as advised in the Repairs report referred to Sept C, H & H committee	Managed Repairs service still being implemented	Included in current mobilisation of the new R&M contract. Once implemented on the 4th June this will be complete.	KP/NM
	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	Managed Repairs service still being implemented	Included in current mobilisation of the new R&M contract. Once implemented on the 4th June this will be complete and full details will be submitted to Committee	NM
	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			
	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	still underway	Will form part of open-book review at end of current R&M contracts.	NM
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		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	Complete	Oct-18	As previous update and 5b (below)	As previous update and 5b (below)	Arrears report function verified and implemented.	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		Complete	Sep-18	Former Tenant Debt recovery policy drafted. Referred to September C, H & H committee for approval	Approved by PP&R 20/11/2018		NM
	c	Tenancy Services	The impact of delays in processing benefit claims and changes in circumstances is identified 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 input to a spreadsheet.	Medium	Oct 17	In progress	Oct-18	Working towards full compliance	As per previous update.	As per previous update.	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		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'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	Jun-19	Working towards full compliance	As per previous update.	Currently updating Asset database on sharepoint	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	As per previous update.	Finance are actively working on Service Charge reviews and resulting erorrs accordingly. Recruitment of a dedicated Service Charge Officer by August 2019.	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		Complete	Oct-18	Working towards full compliance	As per previous update.	Recorded on Orchard via service charge statements and owner accounts. Adjustments with invoices and letters appended to account.	AA/NM
	d	Tenancy Services/ Leasehold	The spreadsheet maintained to determine apportionment 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 reconciliations are performed on a regular basis.	Medium		In progress	Oct-18	Working towards full compliance	As per previous update.	Finance and Housing are continuing to develop service charging processes.	AA/NM
	e	Tenancy Services/ Leasehold	Costs relating to responsive 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	As per previous update.	Finance and Housing are continuing to develop service charging processes.	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	As per previous update.	A Service Charge Officer will be employed to resolve this issue.	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		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	Complete	Oct-18	The draft 'Fair Processing' statement has been drafted and is awaiting corporate approval.	Intellectual Governance Group is working with Housing Services to produce.	Corporate Fair Processing/Privacy Notices have been adopted.	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		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	Complete	Dec-18	Currently under wider corporate review	Currently under wider corporate review	Corporate policies in place with Housing Services Record of Processing Activity (ROPA) completed in line with ICO guidance.	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		Complete		Retention periods for documents are currently being reviewed as part of the wider corporate review	Currently under wider corporate review	Retention periods set on Orchard housing management system and Locata (from which the Housing Register operates).	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		n/a			AA/SDM
2	a	Tenancy Services	Develop an Estate Management Strategy and procedure	High	April 18	Complete		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	Complete		Working towards compliance	Research and funding completed. Programme to be rolled-out.		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	Complete		Working towards compliance	Under Corporate Assets Management Board		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	Complete		Working towards compliance	Determined by the Corporate Assets Management Board		AA/NM/VP
	c	Housing Strategy	Review all Council land and property assest are to be allocated in accordance with above.	Medium		Complete		Currently under wider corporate review	Determined by the Corporate Assets Management Board		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	Working towards compliance	Ongoing compliancy works	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		Ongoing cross-departmental work	New R&M contractor will include property MOTs which will include this on a rolling basis	Included in the mobilisation of the new R&M contract. The property MOTs will be carried out to the entire stock within the next 12 months of the start date.	Sue White (Risk and Insurnace officer)
	b	Repairs	Develop system reports to reflect defined protocols.	Medium	Sept 18	In progress		Ongoing cross-departmental work	New R&M contractor will include property MOTs which will include this on a rolling basis	Included in the mobilisation of the new R&M contract. The property MOTs will be carried out to the entire stock within the next 12 months of the start date.	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			
	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		Ongoing cross-departmental work	Ongoing cross-departmental work	Working protocol between departments has been developed and implemented. Final written strategy would be completed by the Community Safety Team.	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	Ongoing cross-departmental work	Pending submission of written Strategy by Community Safety Team.	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	Complete		Ongoing cross-departmental work	Uniform operational for ASB, with cross-departmental access		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		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		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		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		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		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		n/a		AA/NM/VP