



# ADUR & WORTHING COUNCILS

Joint Governance Committee

30 July 2020

Agenda Item 6

Key Decision: No

Ward(s) Affected: N/A

## INTERNAL AUDIT PROGRESS REPORT REPORT BY THE ACTING HEAD OF INTERNAL AUDIT

### Executive Summary

#### 1. Purpose

This report seeks to update Members of this Committee with:

- 1.1 The current performance of the Internal Audit Section.
- 1.2 Summary information on the key issues raised in final audit reports issued since our last report to the Committee.
- 1.3 The current status on the implementation of agreed audit recommendations.
- 1.4 An update on Priority 1 recommendations outstanding past the agreed implementation dates.

#### 2. Recommendations

##### 2.1 Recommendation One

That the Committee note the contents of this report.

#### 3. Context

##### 3.1 Background

Each quarter, a report is produced for the Joint Governance Committee (Committee) which details the Internal Audit Section's performance against the current Annual Internal Audit Plan and summarises the results of audit work carried out. Internal Audit Services to the Council's, including the role of the Head of Internal Audit is outsourced to Mazars LLP.

## 4. Issues for Consideration

### 4.1 Covid-19

As reported within our progress report to the last Committee on 28 May 2020, the Internal Audit function has continued to operate since the Covid-19 lockdown on 23 March 2020, but the progression of audit work has been impacted. Work on the residual 2019/20 audit audits has recently resumed and work on 2020/21 audits commenced during July 2020.

The UK Public Sector Internal Audit Standards Advisory Board (IASAB) has produced guidance entitled “Conformance with the PSIAS during the coronavirus pandemic” which we are aware of and complying with. The guidance states that “The Mission of Internal Audit is ‘To enhance and protect organisational value by providing risk-based and objective assurance, advice and insight’. In the current circumstances internal auditors will be fulfilling their Mission in different ways than usual. However the critical point is that they should still fulfil that Mission. Ideally, this will provide enough assurance to support audit opinions, and for the Governance Statement”. The key steps suggested from this guidance are those detailed below and we have indicated, where necessary, how we have met the requirement:

<b>Step</b>	<b>Internal Audit Actions</b>
1. Advise the audit committee and other key stakeholders in the governance process of the changes to the audit plan and operations of the internal audit team. A lengthy report is not required but the committee should be made aware. Brief but regular updates should be provided as the situation develops.	Discussions were held with the Chief Finance Officer (CFO) on audit operations and the 20/21 Audit Plan was revised to ensure adequate coverage of key risk areas and to include audits of governance and other arrangements put in place during the pandemic.  Revised plan was considered by JGC on 28 <sup>th</sup> May 2020. Updates will be provided in ongoing reporting to JGC.
2. Maintain regular and constructive communications with external audit. This will help external audit understand how delivery of assurance is being progressed and provide information on changes in the organisation’s system of governance and control	Communication with External Audit is maintained by the CFO and when required by Internal Audit (IA) staff.
3. Where internal audit staff are reassigned to undertake advisory or consultancy work rather than assurance engagements then they should be made aware of the standards relating to consulting activities, if they are not already familiar with them	N/A
4. Where internal audit staff are diverted into operational roles it should be made clear that for the duration that the staff are not operating as internal auditors. When staff return to their internal audit role, a review can be undertaken to see if any steps are necessary to address impairment to independence and objectivity	N/A

Step	Internal Audit Actions
5. Keep clear records of the changes to roles and plans. These will help key stakeholders understand the revised arrangements and will help resolve any conflicts of interest later.	N/A for changes to roles Records of plan changes are retained.
6. Remember the Mission of Internal Audit and act in accordance with it. When the immediate crisis is over the head of internal audit should be able to demonstrate how the operation of internal audit has helped fulfilment of the Mission	The revised Audit Plan remains risk-based and includes providing assurance on new systems and processes, and the governance arrangements during the pandemic.  IA is currently assisting in the Department for Business, Energy and Industrial Strategy (BEIS) Risk Assessment required in respect of the Covid-19 business support grants paid.  Where requested, IA has also provided guidance, such as on stock control for the Food Depot, where new systems and processes have been developed in response to the pandemic.
7. At all times Internal Auditors should comply with Government advice, and that of their organisation, regarding health and safety during the coronavirus pandemic	IA staff have, and continue to work from home.

#### 4.2 **Internal Audit Performance - 2019/20 and 2020/21**

As previously reported to the Committee, the Covid-19 pandemic has had an impact on completion of 2019/20 and 2020/21 audit plans. At 30 June 2020, 391.63 (86.5%) of the planned 2019/20 days had been delivered. Attached as **Appendix 1** is a summary of the current status of audits in the plan.

As detailed in 4.1 above, work on audits contained in the 2020/21 audit plan has only recently started. The current status of the 2020/21 audits is attached as **Appendix 2**.

Internal Audit attends monthly meetings with the CFO and is in regular contact with her in respect of progress against the plan.

### 4.3 Final Audit Reports

Internal Audit's assurance opinions accord with an assessment of the controls in place and the level of compliance with these controls. During the course of an audit, a large number of controls will be examined for adequacy and compliance. The assurance level given is the best indicator of the system's control adequacy. The assurance levels and their associated explanations are:

<b>Full Assurance</b>	There is a sound system of control designed to achieve the system objectives and the controls are being consistently applied.
<b>Satisfactory Assurance</b>	there is a basically sound system, there are weaknesses that put some of the system objectives at risk, and/or there is evidence that the level of non-compliance with some of the controls may put some of the system objectives at risk.
<b>Limited Assurance</b>	Weaknesses in the system of controls are such as to put the system objectives at risk, and/or the level of non-compliance puts the system objectives at risk.
<b>No Assurance</b>	Control is generally weak, leaving the system open to significant error or abuse, and/or significant non-compliance with basic controls leaves the system open to error or abuse.

Recommendations made in audit reports are categorised according to the level of priority as follows:

<b>Priority 1</b>	Major issues for the attention of senior management and the Audit Committee.
<b>Priority 2</b>	Other recommendations for local management action.
<b>Priority 3</b>	Minor matters.

Since our report to the Committee in May 2020, three reports from the 2019/20 plan have been finalised. One was given a Satisfactory Assurance opinion (Asbestos Management) and two were given a Limited Assurance opinion (Building Maintenance Compliance (corporate buildings) and Network Architecture and Resilience). Four P1 recommendations were raised within these reports, (all being within the Building Maintenance limited assurance audit).

A summary of the final reports issued since our last report to this Committee, including the key issues raised, is attached as **Appendix 3**. Details of the Priority 1 and Priority 2 recommendations raised within these reports have also been circulated to Members prior to the meeting in a separate briefing note.

#### 4.4 Follow up of Audit Recommendations

In accordance with the Council's Follow-Up Protocol, we have continued following-up the status of implementation of recommendations contained in final audit reports.

Follow-up is undertaken to ensure that all recommendations raised have been successfully implemented according to the action plans agreed with the service managers. The Follow-up Protocol requires implementation of 80% of all Priority 2 and 3 recommendations and 100% of priority 1 recommendations.

The current performance in relation to these targets for the last three years is shown in the tables below:

**Status of recommendations 2017/18**

	Total Due	Imp	%	Carried Over (Not Impl'd)	%	Overdue	%	Overdue & No Response	%	Total % NOT Impl'd	Not Due	Total
<b>P1</b>	37	33	<b>89.2%</b>	0	<b>0%</b>	4	10.8%	0	0%	<b>10.8%</b>	0	37
<b>P2</b>	86	66	<b>76.7%</b>	6	<b>7%</b>	14	16.3%	0	0%	<b>23.3%</b>	0	86
<b>P3</b>	26	21	<b>80.8%</b>	2	<b>7.7%</b>	3	11.5%	0	0%	<b>19.2%</b>	1	27
<b>Other</b>	1	0	<b>0%</b>	0	<b>0%</b>	1	100%	0	0%	<b>100%</b>	0	1
<b>Total</b>	<b>150</b>	<b>120</b>	<b>80%</b>	<b>8</b>	<b>5.3%</b>	<b>22</b>	<b>14.7%</b>	<b>0</b>	<b>0%</b>	<b>20%</b>	<b>1</b>	<b>151</b>

**Status of recommendations 2018/19**

	Total Due	Imp	%	Carried Over (Not Impl'd)	%	Overdue	%	Overdue & No Response	%	Total % NOT Impl'd	Not Due	Total
<b>P1</b>	16	8	<b>50%</b>	0	<b>0%</b>	5	<b>31.2%</b>	3	<b>18.8%</b>	<b>50%</b>	2	18
<b>P2</b>	91	73	<b>80.2%</b>	0	<b>0%</b>	13	<b>14.3%</b>	5	<b>5.5%</b>	<b>19.8%</b>	25	116
<b>P3</b>	34	30	<b>88.2%</b>	0	<b>0%</b>	4	<b>11.8%</b>	0	<b>0%</b>	<b>11.8%</b>	8	42
<b>Total</b>	<b>141</b>	<b>111</b>	<b>78.7%</b>	<b>0</b>	<b>0%</b>	<b>22</b>	<b>15.6%</b>	<b>8</b>	<b>5.7%</b>	<b>21.3%</b>	<b>35</b>	<b>176</b>

## Status of recommendations 2019/20

	Total Due	Imp	%	Carried Over (Not Impl'd)	%	Overdue	%	Overdue & No Response	%	Total % NOT Impl'd	FU Not Due	Total
P1	4	3	75%	0	0%	0	0%	1	25%	25%	5	9
P2	32	23	71.9%	0	0%	3	9.4%	6	18.7%	28.1%	20	52
P3	5	5	100%	0	0%	0	0%	0	0%	0%	6	11
Total	41	31	75.6%	0	0%	3	7.3%	7	17.1%	24.4%	31	72

Attached as **Appendices 4, 5 & 6**, are tables which summarise the outstanding recommendations made in final audit reports from audits contained in the 2017/18, 2018/19 and 2019/20 Audit Plans. The shaded boxes indicate where changes have occurred since our last report.

We are also continuing to follow up on 11 recommendations (all Priority 2) which remain outstanding from audits contained in the 2016/17 Audit Plan.

We have also highlighted in **Appendix 7** those Priority 1 recommendations which remain outstanding after the agreed implementation dates.

There are 13 outstanding Priority 1 recommendations detailed within this report which is the same as that reported to the Committee on 28 May 2020.

## 5. Engagement and Communication

5.1 Internal Audit attends monthly meetings with the CFO on progress against the plan. Issues arising and potential plan changes are discussed both at these meetings and whenever necessary. This has included specific discussions in relation to the Covid-19 situation and impact on Internal Audit work.

## 6 Financial Implications

6.1 There are no financial implications arising from this report.

## 7. Legal Implications

7.1 There are no legal matters arising as a result of this report.

## Background Papers

None

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## **Sustainability & Risk Assessment**

### **1. Economic**

1.1 Matter considered and no issues identified.

### **2. Social**

#### **2.1 Social Value**

Matter considered and no issues identified.

#### **2.2 Equality Issues**

Matter considered and no issues identified.

#### **2.3 Community Safety Issues (Section 17)**

Matter considered and no issues identified.

#### **2.4 Human Rights Issues**

Matter considered and no issues identified.

### **3. Environmental**

Matter considered and no issues identified.

### **4. Governance**

The report does not seek to meet any particular Council priority.



	Audit	Field Work complete	Draft Issued	Final Issued	Assurance level	1	2	3	Total	P1 issues
4	Management of the Commercial Property Portfolio	WIP								
4	Tenancy Management	WIP								
4	General Ledger	WIP								
4	Exchequer (Creditors & Debtors)	WIP								
4	Risk Management	Y	Y	Y	Satisfactory	0	4	0	4	No P1 recs.
4	Business Continuity	P								
4	Contract audit - Concrete Repairs - Grafton Car Park	Y	UR							
4	Procurement & Contract Management Housing	WIP								
4	Management of Capital Programme	Y	UR							
4	Network Architecture and Resilience	Y	Y	Y	Limited	0	4	3	7	No P1 recs.

**Key:**

WIP – Work in progress

P – Audit has been planned and a start date agreed





**Key issues from finalised audits****Appendix 3**

<b>Audit (Plan Year)</b>	<b>Assurance Level &amp; Number of Issues</b>	<b>Summary of key issues raised</b>
Asbestos Management (19/20)	<b>Satisfactory</b>  (Three Priority 2 and One Priority 3 recommendations)	No Priority 1 recommendations raised.
Network Architecture & Resilience (19/20)	<b>Limited</b>  (Four Priority 2 and Three Priority 3 recommendations)	No Priority 1 recommendations raised.
Building Maintenance Compliance (corporate buildings) (19/20)	<b>Limited</b>  (Four Priority 1 and five Priority 2 recommendations)	The Priority 1 recommendations raised were in respect of: <ul style="list-style-type: none"><li>- The need for gas and electrical safety policies;</li><li>- Defining and documenting specific roles and responsibilities;</li><li>- Holding regular contract monitoring meetings with all contractors; and</li><li>- Ensuring rectifications required from inspections are actioned in a timely manner.</li></ul>

Status of outstanding audit recommendations 2017/18

APPENDIX 4

	Joint Audit	Final Report Date	Assurance level	Total No of Recs	Number of agreed recs completed	1	2	3	Other	% of recs completed	Number of recs outstanding	1	2	3	Other	% of recs outstanding	Comments
<b>Director for Communities</b>																	
<b>Housing</b>																	
Rent Collection and Collection of Arrears	ADC	Jan-18	Satisfactory	2	1	0	1	0	0	50%	1	0	0	1	0	50%	Update provided confirmed rec is in progress & Capita have been engaged to undertake the work - deadline revised to 31/3/20 - further update requested on 9/7/20
Leaseholder Charges	ADC	Mar-18	No	39	30	11	16	3	0	77%	9	4	5	0	0	23%	Updates provided through the Audit App confirmed completion of recs with 9 still outstanding and deadlines revised to 30/9/20
Gas Safety Inspections	ADC	Jul-18	Limited	16	14	3	11	0	0	88%	2	0	2	0	0	13%	Update provided through App confirmed 2 outstanding recs still in progress deadlines had been revised to 30/6/20.
<b>Director of Digital &amp; Resources</b>																	
<b>Finance</b>																	
Compliance with IR35 - Tax legislation	*	Feb-19	Limited	6	2	1	1	0	0	33%	4	0	3	1	0	67%	Plans made to implement recs were impacted by Copvid-19 deadlines have been revised to 31/10/20.
<b>Computer Audits</b>																	
Mats - Application Audit	*	Oct-19	Satisfactory	6							6	0	4	2	0	100%	Two P2 recs were overdue and the deadlines have been revised - three further recs are now overdue - request for update sent 9/7/20. Remaining recommendation will be followed up through Audit App when due
Review of Technology Strategy	*	Apr-18	No opinion given	1							1	0	0	0	1	100%	deadline was extended to Mar 20 - update requested on 9/7/20.
											23	4	14	4	1		



	Joint Audit	Final Report Date	Assurance level	Total No of Recs	Number of agreed recs completed	1	2	3	Other	% of recs completed	Number of recs outstanding	1	2	3	Other	Percentage of recs outstanding	Comments
<b>Director for Communities</b>																	
<b>Adur Worthing Contract Services</b>																	
Waste Management	*	Mar-19	Satisfactory	7	6	0	4	2	0	86%	1	0	0	1	0	14%	Update provided through App has confirmed deadline for o/s changed to 3/8/20.
<b>Environment</b>																	
Bereavement Services	*	Nov-18	Satisfactory	4	2	1	1	0	0	50%	2	0	2	0	0	50%	Implementation date for the 2 outstanding recs has been revised further follow up when due.
<b>Housing</b>																	
Building Services - Stocks & Stores	ADC	Oct-19	Limited	8							8	3	5	0	0	100%	Update confirmed that the whole set up of the stores service is under review - deadline for the 7 o/s recs has therefore been revised to 30/9/20.
Housing Repairs - Matsoft processes	ADC	Mar-20	Limited	30	3	1	2	0	0	10%	27	4	18	5	0	90%	3 recommendations are now overdue - update requested 10/7/20
<b>Wellbeing</b>																	
Air & Water Quality	*	Mar-19	Satisfactory	4	3	0	3	0	0	75%	1	0	1	0	0	25%	The recommendation owner has confirmed Covid-19 has impacted on implementation - revised deadline of 31/12/20 set
<b>Director of Digital &amp; Resources</b>																	
<b>Customer &amp; Digital Services</b>																	
Risk Management	*	May-19	Satisfactory	7	6	0	5	1	0	86%	1	0	1	0	0	14%	One rec due by 31/12/19 was confirmed as still outstanding in 19/20 audit but no revised deadline has been set - update requested 9/7/20
Compliance with the Freedom of Information Act	*	Mar-19	Limited	9	8	1	7	0	0	89%	1	1	0	0	0	11%	Update provided through App confirmed 3 further recs completed - deadline revised for remaining one.
<b>Legal</b>																	
Corporate Governance	*	Mar-19	Satisfactory	9	4	0	3	1	0	44%	5	1	1	3	0	56%	Deadline has been revised for o/s P1 to 31/8/20, update for 4 o/s recs requested 10/7/20.
<b>Director for Economy</b>																	
<b>Place &amp; Investment</b>																	
Asset Management	*	Mar-20	Limited	4							4	1	3	0	0	100%	3 recs due at 31 Mar 20 no update provided yet - updated requested 10/7/20
<b>Planning &amp; Development</b>																	
Development Management	*	Feb-19	Satisfactory	7	5	0	5	0	0	71%	2	0	2	0	0	29%	update requested 10/7/20 re o/s 2 recs
<b>Computer Audits</b>																	
Data Centre Access Procedure	*	Jul-19	Limited	11	8	1	7	0	0	73%	3	0	3	0	0	27%	Update provided through App confirmed deadlines extended for 2/3 recs now overdue - no update yet provided for remaining o/s rec
Content Management (Website- Internet)	*	May-20	Limited	9							9	0	6	3	0	100%	Recs to be followed up through Audit App when due
<b>Cross Service Audits</b>																	
Energy Management	*	Aug-19	Satisfactory	3	2	0	1	1	0	67%	1	0	1	0	0	33%	Deadline for o/s rec revised to 31/12/20.
											65	10	43	12	0		

Status of outstanding audit recommendations 2019/20

APPENDIX 6

	Joint Audit	Final Report Date	Assurance level	Total No of Recs	Number of agreed recs completed	1	2	3	Other	% of recs completed	Number of recs outstanding	1	2	3	Other	% of recs outstanding	Comments
<b>Director for Communities</b>																	
<b>Housing</b>																	
Rent in Advance	*	Mar-20	Limited	11							11	1	9	1	0	100%	8 recs now overdue - update requested 10/7/20. Remainder will be followed up through the App when due - 1 P2 due at end of Mar but no update yet
Allocations	*	Dec-19	Satisfactory	2	2	0	1	1	0	100%							COMPLETE
<b>Director of Digital &amp; Resources</b>																	
<b>Revenues &amp; Benefits</b>																	
Revenues & Benefits	*	Feb-20	Satisfactory	1							1	0	0	1	0	100%	Rec will be followed up through the App when due
<b>Financial Services</b>																	
Budget Development	*	Oct-19	Satisfactory	1							1	0	1	0		100%	review of App confirmed rec still not implemented - no update yet.
<b>Customer &amp; Digital Services</b>																	
Risk Management	*	Apr-20	Satisfactory	4							4	0	4	0	0	100%	Rec will be followed up through the App when due
<b>Legal Services</b>																	
Decision Making	*	Sep-19	Satisfactory	1							1	0	1	0		100%	Rec was due on 31/10/19 - update requested 10/7/20.
<b>Human Resources</b>																	
Data input & accuracy	*	Feb-20	Limited	10	10	1	8	1	0	100%							COMPLETE
Apprenticeships	*	Apr-20	Satisfactory	5	3	0	3	0	0	60%	2	0	2	0	0	40%	Recs will be followed up through the App when due
<b>Business &amp; Technical Services</b>																	
Asbestos Management (non Housing)	*	Jul-20	Satisfactory	1							1	0	1	0	0	100%	Rec will be followed up through App when due
Business Continuity	*																
Building Maintenance Compliance (non Housing)	*	Jul-20	Limited	9							9	4	5	0	0	100%	Rec will be followed up through App when due
<b>Director for Economy</b>																	
<b>Planning &amp; Development</b>																	
Planning Enforcement	*	Jan-20	Limited	9	6	0	6	0	0	67%	3	0	2	1	0	33%	Recs will be followed up through the App when due
<b>COMPUTER AUDITS</b>																	
Network Architecture and Resilience	*	Jun-20	Limited	7							7	0	4	3	0	100%	Recs will be followed up through the App when due
GDPR Compliance	*	Apr-20	Limited	6	5	2	3	0	0	83%	1	1	0	0	0	17%	Rec will be followed up through the App when due
											41	6	29	6	0		

## Outstanding Priority 1 Recommendations

## Appendix 7

### Leaseholder Service Charges (2017-18 Final Report issued March 2018)

Recommendation (Reference & content)	Findings and Risk as outlined in Final Audit Report	Agreed Action, Comments & Original Implementation deadline	Follow Up Comments	Proposed Completion Date
<p><b>3.1</b> The Council should document a Leasehold Management Policy, which outlines the legislative framework (and timescales) within which it is required to operate for the various leasehold functions and services that it provides.</p> <p>The policy should:</p> <ul style="list-style-type: none"> <li>• Outline any local policy decisions in respect of the management of leaseholders, recovery of charges etc. and detail how these requirements will be achieved;</li> <li>• Clearly state how the Council will deal with major repair costs, including outlining the statutory processes that have to be completed and the timescales to ensure the recovery of costs (e.g. invoice or issue S20B notice within 18 months of cost being incurred; and</li> <li>• State at what level the cost of repairs will be pursued (e.g. minor costs above the £250 legislative rate may not be cost effective for the Council to pursue where there are only a few leaseholders, but if there were several then the costs and effort would be worth it).</li> </ul> <p>Once documented, the Policy should be approved by the relevant senior management, member and committee.</p>	<p>There is currently no approved documented policy for Leasehold Management.</p> <p>Where an up to date documented and approved policy does not exist, there is a risk that the Council's objectives and/or responsibilities are not known and may not therefore be achieved.</p>	<p>An overarching policy will be developed. This will be supported by a set of detailed policies and procedures. Work has already begun on identifying those that are required and this will be used as an action plan to ensure all required actions are completed.</p> <p>Deadline - 30<sup>th</sup> September 2018</p>	<p>Update provided by Interim Leasehold Manager confirmed that a policy was drafted but that the process of consultation and approval needed to be agreed and then completed.</p> <p>Update provided by Housing Operations Manager on 4<sup>th</sup> March 2020 confirmed:-</p> <p>The Repairs policy has been rejected on the grounds of a lack of consultation. A clearer consultation strategy will be needed as part of the process of approving this policy. The aim will be to define this in March 2020. The policy may not be approved therefore until after the local election in May 2020. The target for this needs to be revised to May/June 2020.</p> <p>Updated provided by Interim Leasehold Manager on 3<sup>rd</sup> April 2020 confirmed:-</p> <p>Policy drafted. Consultation vehicle or forum for leaseholders needs to be set up in line with AH resident engagement strategy. Not practical to progress during Covid situation. Deadline extended.</p>	<p>31<sup>st</sup> July 2020</p>

Recommendation (Reference & content)	Findings and Risk as outlined in Final Audit Report	Agreed Action, Comments & Original Implementation deadline	Follow Up Comments	Proposed Completion Date
<p><b>3.25</b> A complete revamp of how major works are invoiced is required in order to ensure that works are accurately billed in line with costs incurred, lease requirements and the requirements of Section 20B of the Landlord &amp; Tenant Act 1985.</p> <p>Furthermore clarification should be sought from the relevant experts as to how VAT should be dealt with in respect of recharging leaseholders the cost of major works.</p>	<p>The Landlord and Tenant Act 1985 details specific requirements for invoicing. Accuracy of invoicing also assists the Council recover all sums expended.</p> <p>From our review of the major works monitoring spreadsheet, we noted that in many instances, invoicing did not occur until final figures have been received from Technical Services regardless of when the works were completed or when costs were incurred.</p> <p>From our testing on the invoicing for five major works we identified:</p> <p>- 1 (85-89 Buci Crescent - Porch) where we found no evidence to confirm that the completed works have been invoiced to the leaseholder or that a Section 20B notice had been served. The contractor's invoice for these works (valued at £3,729.60) was dated 31/1/2015 so under the Section 20B the 18 month rule may no longer be recoverable.</p> <p>These works were consulted on and there is evidence of such within the N drive and I@W however after the 2<sup>nd</sup> stage consultation we found no further evidence to support how the works progressed or whether a Section 20B notice was issued. We have noted that these works were generated through the HMS order and monitored by ADC Maintenance Officers rather than</p>	<p>A complete overhaul of the major works invoicing process will be undertaken in line with the development of new processes. Training will then be provided and the Leaseholder Handbook and website information will be updated accordingly.</p> <p>The Government Guidelines on VAT and residential service charges will be considered and complied with during the invoicing process.</p> <p>Deadline - 31<sup>st</sup> March 2019</p>	<p>Update provided by Interim Leasehold Manager confirmed that this recommendation is being considered as part of the wider review in Adur Homes for the planning, management and delivery of the capital programme.</p> <p>Update provide by Housing Operations Manager on 4<sup>th</sup> March 2020 confirmed:-</p> <p>As an additional update an appointment to the role of Programme manager is due in March 2020 which will facilitate this action. The date for completing needs to be pushed back at least a quarter to 30<sup>th</sup> June 2020.</p> <p>Update provided on 29<sup>th</sup> June 2020 confirmed work has started and the implementation deadline extended to 30<sup>th</sup> September 2020 as completion is linked to other recommendations including those detailed below.</p>	<p>30<sup>th</sup> September 2020</p>

Recommendation (Reference & content)	Findings and Risk as outlined in Final Audit Report	Agreed Action, Comments & Original Implementation deadline	Follow Up Comments	Proposed Completion Date
	<p>through Technical Services.</p> <ul style="list-style-type: none"> <li>- For 2/4 works (387 Brighton Road – wall ties and 14-18 Lisher Road - replacement of metal railings, balustrades &amp; external decorations), we were unable to locate a copy of the invoice sent to the leaseholder to confirm whether the invoice specifically detailed the actual costs incurred (as required by Section 20B).</li> <li>- For the other 2 works (Grange Court – fire safety and 72-78 Buci Crescent – soil stack) the invoices contain no detail of the actual costs incurred.</li> <li>- 1 (Fire Safety works - Grange Court/Sea House/Locks Court) where the final account figure of £102,811.95 (used to calculate the invoices sent to the leaseholders) does not equate to the sum of the invoices paid to the contractor for these works (£136,067.94).</li> <li>- 1 (72-78 Buci Crescent - Soil Stack) where the tender value was £1,328 yet the final invoice value claimed was £2,096. There is no final account for these works as they were raised as an order through HMS so were managed by a Maintenance Officer. However, the original estimated cost to each leaseholder was £365.20 with the final invoice figure being £371.25. This small increase does not seem to equate to the £768 increase in overall cost of the works.</li> </ul>			

Recommendation (Reference & content)	Findings and Risk as outlined in Final Audit Report	Agreed Action, Comments & Original Implementation deadline	Follow Up Comments	Proposed Completion Date
	<p>We have also noted during testing that the contracted works attracted VAT yet VAT is not included in any recharge made to leaseholders.</p> <p>Where accurate and detailed invoicing does not occur, there is an increased risk that the Council is failing to meet legislative requirements, that leaseholder challenge may occur and that financial loss will result.</p>			
<p><b>3.32</b> The Council's Policy in respect of options available to leaseholders for payment of major works should be reviewed, approved by ADC Executive and then consistently applied.</p>	<p>On 15 June 2010, the ADC Cabinet decided the payment option arrangements for leaseholders, this includes the provision of ten year loans. Furthermore, on 13 July 2010 the ADC Cabinet decided additional deferred payment arrangements for works costing more than £5,000 in any financial year.</p> <p>We have not identified any other reports/decisions which revise the decisions taken by the ADC Cabinet in June/July 2010 therefore these decisions would appear to be the most recent and therefore constitute the current policy.</p> <p>These policy decisions are not, however accurately reflected in the current Leaseholders Handbook which states "If you are not able to pay for the cost of major works in full at the time of invoicing, then we offer an interest free loan up to five years depending on the size of the bill and individual circumstances. In this case you will pay</p>	<p>The arrangements will be reviewed with Finance and Legal.</p> <p>Deadline - 31<sup>st</sup> March 2019</p>	<p>As above.</p> <p>Update provide by Housing Operations Manager on 4<sup>th</sup> March 2020 confirmed:-</p> <p>The Leasehold Manager is drafting options for payment for leaseholders. Once this is completed sign off by Finance will be needed. Finance has been consulted as part of the process of drawing up these options.</p> <p>Update provided on 29<sup>th</sup> June 2020 confirmed this recommendation is being processed in line with other recommendations and the deadline has been revised.</p>	<p>30<sup>th</sup> September 2020</p>

Recommendation (Reference & content)	Findings and Risk as outlined in Final Audit Report	Agreed Action, Comments & Original Implementation deadline	Follow Up Comments	Proposed Completion Date
	<p>in monthly instalments by either direct debit or payment card".</p> <p>The policy decisions were also not detailed correctly in the Paying for Major Works information that was sent to leaseholders in March 2017 with their invoices. The differences being:</p> <ul style="list-style-type: none"> <li>• The interest added column on the Paying for Major works information states 5.4% for all works costing more than £500 yet this is not what is detailed in the decision by Cabinet.</li> <li>• The Cabinet decision in June 2010 states that "for loans exceeding £1,500, a Land Registry charge would be taken out" the Land Registry requirement on the Paying for Major Works information states N/A for works costing £1,500-£5,000.</li> <li>• The Cabinet decision in July 2010 states the administration fee for deferred payments as £100 yet the Paying for Major Work information states £90.</li> </ul> <p>Our walkthrough of a loan arranged in 2015 has shown that he was advised that the charges added to the loan for £10,998 would be 4.4% interest (reviewed annually), £50 admin fee, £40 Land Registry fee and £295 legal costs. This contradicts the Cabinet's decision which states an administration fee of £90 and a Land Registry fee of £50. Furthermore, the reports to the ADC Cabinet in 2010 made no mention of</p>			

Recommendation (Reference & content)	Findings and Risk as outlined in Final Audit Report	Agreed Action, Comments & Original Implementation deadline	Follow Up Comments	Proposed Completion Date
	<p>legal costs (nor did the information sent to leaseholders in 2017). The amounts actually invoiced to this leaseholder were £1209.59 interest (so no annual review), £295 legal costs and £40 Land Registry fee (so no admin fee and incorrect LR fee).</p> <p>We have further confirmed that as a result of invoices sent in February 2017, one leaseholder requested to pay their major works costs (£3,072.49) over a period of 24 months. The email sent to this leaseholder confirms that no interest has been added and that monthly standing order payments should be arranged by the leaseholder. The policy requires DD payments and there is no mention of admin or Land Registry costs that the policy requires and no evidence can be seen on HMS/I@W to confirm that costs have been invoiced.</p> <p>Where approved policies are not known or accurately and consistently applied, there is an increased risk that loans are incorrectly arranged or that incorrect fees are charged. This may result in financial loss to the Council.</p>			
<p><b>3.33</b> Once the Major Works Payment Policy has been decided the Council should review how implementing payment loans/arrangements will for major works will be achieved.</p> <p>An agreed process, which reflects policy requirements should be effected to ensure that any future</p>	<p>Proper arrangements are required to ensure that the Council effects payment arrangements correctly and in line with any policy and legal requirements.</p> <p>We found some procedures and forms (including a Service Charge Loan Application Form) on the N Drive and</p>	<p>This will be reviewed with Finance and Legal.</p> <p>Deadline - 31<sup>st</sup> March 2019</p>	<p>As above.</p>	<p>30<sup>th</sup> September 2020</p>

Recommendation (Reference & content)	Findings and Risk as outlined in Final Audit Report	Agreed Action, Comments & Original Implementation deadline	Follow Up Comments	Proposed Completion Date
<p>loans/arrangements are correctly actioned. Legal Services and Finance should be involved in any discussions to ensure that all legal and financial requirements are met.</p> <p>The agreed process should be formalised in a documented procedure which details the forms that need to be completed, by whom and when and how supporting information/documentation should be retained.</p>	<p>emails between the Finance and Leasehold teams going back several years. Our examination of this information suggests that the information provided by the leaseholder on the loan application form would seem to be the primary source for calculation of affordability.</p> <p>Any payment arrangements were effected by Finance until April 2016, when the arrangements transferred to the Adur Homes Leasehold Team.</p> <p>We were advised by the Leasehold Officers that they are very unsure regarding the procedures to be followed, whether they are up-to-date, lines of responsibility etc. They also had queries regarding:</p> <ul style="list-style-type: none"> <li>• how instalments and interest would be applied to Owner Accounts;</li> <li>• monitoring;</li> <li>• how the Council would legally stand in recovering any arrears of interest etc. if charges were not made against properties; and</li> <li>• their ability to calculate interest on loans and setting-up loan/instalment agreements with interest;</li> </ul> <p>We have noted elsewhere in the audit inconsistencies with arranging loan agreements and lack of supporting information which would suggest that current arrangements are not effective.</p> <p>Where a defined process for effecting payment arrangements does not exist,</p>			

Recommendation (Reference & content)	Findings and Risk as outlined in Final Audit Report	Agreed Action, Comments & Original Implementation deadline	Follow Up Comments	Proposed Completion Date
	there is an increased risk that arrangements are not correctly made or that legal requirements are not satisfied and this may impact on the Council's ability to recover all relevant costs leading to possible financial loss.			

### Compliance with the Freedom of Information Act 2018/19 (Final report issued in March 2019)

Recommendation (Reference & content)	Findings and Risk as outlined in Final Audit Report	Agreed Action, Comments & Original Implementation deadline	Follow Up Comments	Proposed Completion Date
<p><b>3.10</b> All FOI requests should be responded to within 20 working days in accordance to the statutory requirements.</p>	<p>The FOI Act requires that FOI requests are replied to within 20 working days.</p> <p>Tests on the sample of ten FOI requests identified three cases where the responses were made after the 20 working day requirement. We also identified a further two cases which did not appear to have been responded to.</p> <p>Where FOI requests are not responded to within twenty working days, there is an increased risk of customer dissatisfaction leading to complaints and investigation by the Information Commissioner. The Councils' reputation will be damaged and they may be fined due to non-compliance.</p>	<p>The SIGO has already taken steps to address this. Any FOI that goes over the deadline becomes the responsibility of the Head of Service. Notifications are also sent to Directors where deadlines are at risk of being missed. Responsibility is escalated as early as possible. Compliance has improved but further work needs to be done. The FOI workshops and online training mentioned above should also highlight the need to respond</p> <p>Deadline - 31<sup>st</sup> May 2019</p>	<p>Update provided by Head of Customer &amp; Digital Services on 9<sup>th</sup> August 2019 confirmed that performance on FOI responses had improved significantly since the audit and is being reported to CLT but the SIGO position had been vacant since July 2019 but a new officer was starting in October 2019 who will continue to progress the good work completed so far.</p> <p>Update provided by SIGO on 28<sup>th</sup> February 2020 confirmed that "Ongoing issues. Deadline moved to June 2020, because of the ETA for new policies (May 2020), the introduction of the Information Governance Service Plan 20/21 (OLG on 30<sup>th</sup> March 2020) and subsequent development</p>	<p>30<sup>th</sup> September 2020</p>

			<p>and embedding of compliance standards for Services.</p> <p>Workshop on FOI/EIR for SIOs was held on 24<sup>th</sup> February 2020 and importance of deadlines reiterated.</p> <p>Also, monthly case studies are now published in the staff newsletter that also reiterate the importance of compliance”.</p> <p>Update provided by SIGO on 29<sup>th</sup> June 2020 confirmed “Ongoing issue. To be raised at CLT meeting on 30<sup>th</sup> June 2020 as major issue. It was previously raised at Services’ DMTs, in regular comms with Heads of Services and Service Information Officers, and in the InfoGov Annual Report 2019/2020. The Services are provided with a list of DP/InfoGov Standards (with definitions and legal bases) that are expected of them and with checklists to help with compliance. Deadline updated to reflect the deadline for action (September 2020) identified by SIRO at the TIB meeting on 10<sup>th</sup> June 2020”.</p>	
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**Corporate Governance 2018/19 (Final Report issued March 2019)**

Recommendation (Reference & content)	Findings and Risk as outlined in Final Audit Report	Agreed Action, Comments & Original Implementation deadline	Follow Up Comments	Proposed Completion Date
<p>3.8 Mandatory training in respect of governance (such as ethics and risk management) should be provided to all staff when they start at the Councils, as a refresher on a tri-annual basis and when any legislative changes occur.</p> <p>The Monitoring Officer should consult with Human Resources (HR) through the People Working Group or by other means in order to highlight issues and gaps in officer awareness, and identify satisfactory means by which relevant staff could have these areas matched to their training plans.</p>	<p>There is currently no mandatory governance training provided to staff and there is no longer centralised induction training provided where such issues may be raised.</p> <p>Whilst we noted that HR are currently in the process of reviewing training provision, including at time of induction, through the People Working Group, the group did not that time have any representation from Legal/Democratic Services.</p> <p>During the audit we noted a number of areas in which officers expressed reservations about wider staff awareness of core governance requirements including:</p> <ul style="list-style-type: none"> <li>• The need to register and publish notice of key and exempt decisions at least 28 days in advance; and</li> <li>• The need to inform the Monitoring Officer of any sub-delegations of duty.</li> </ul> <p>Where officers are unfamiliar with governance requirements, there is a risk that constitutional and/or statutory responsibilities will not be met which could result in unlawful or mismanaged decisions and actions.</p>	<p>Governance and Decision Making Training has been offered on 3 separate occasions to all Senior Managers, Heads of Service &amp; Directors during the last 6 months. This included training about key and exempt decisions.</p> <p>Training on Scheme of Delegations to Officers is being undertaken on a one to one basis with each Head of Service and their managers and there is a rolling programme being undertaken to review all sub delegations and publish the register of sub- delegations. It is anticipated this will be completed by December 2019.</p> <p>Training on ethics should be completed by line managers at induction time with reference to the Officer Code of Conduct and Protocol for Relationships which form part of the constitution and are available to all staff on the website.</p> <p>Deadline - 31<sup>st</sup> December 2019</p>	<p>Update provide by Monitoring Officer on 24<sup>th</sup> February 2020 confirmed that “induction training is being developed. It is anticipated that this will cover ethics, officer code of conduct, risk management, officer scheme of delegations, committee structure, decision making and key and decisions, exempt information and access to information.</p> <p>It is anticipated that a cycle of the training being delivered every 6 months to new starters will commence this summer”.</p> <p>Deadline has been revised to allow for first cycle of training to be conducted.</p>	<p>31<sup>st</sup> August 2020</p>

**Building Services – Stocks & Stores 2018/19 (Final Issued October 2019)**

Recommendation (Reference & content)	Findings and Risk as outlined in Final Audit Report	Agreed Action, Comments & Original Implementation deadline	Follow Up Comments	Proposed Completion Date
<p>3.2 Adur Homes should develop a policy that defines, amongst others:</p> <ul style="list-style-type: none"> <li>- How Building Services will procure materials (i.e. through the use of one contracted supplier and/or the use of local suppliers);</li> <li>- The quality standards expected when purchasing materials;</li> <li>- Levels of stock to be held;</li> <li>- Considerations to be made when purchasing (i.e. whether purchasing more costly LED lights will reduce Operative and overhead costs in the long term);</li> <li>- Any specific brands to be prioritised when purchasing,</li> </ul> <p>considering any historic use of these and the lower cost and time implications in replacing these; and</p> <ul style="list-style-type: none"> <li>- When and/or how the Service will stock vans (i.e. Operatives are only given the supplies to do each job and/or there will be a minimum stock level of certain types of incidentals such as nails, screws or other materials that they keep on each van).</li> </ul> <p>Where standards are established, they should be documented and reviewed on an annual basis. Management should then monitor to ensure that standards are met.</p>	<p>Maintaining a Policy on how equipment and materials are procured, standards required and van stocking etc. will assist management ensure that materials and equipment is purchased and used in line with both service and Council objectives (such as the Sustainable Procurement Strategy).</p> <p>We confirmed that at present, Building Services do not have any contract arrangement with a particular supplier for the provision of materials and equipment. Furthermore, there is no documented policy in place defining how the Service will procure its materials, standards required, stock levels, or how it will stock its vans.</p> <p>Where there is no written policy in place determining how materials are purchased etc, there is an increased risk that irregular and/or inadequate purchasing/stocking occurs leading to poor value for money, non-compliance with Council objectives, inefficiencies and possible financial loss.</p>	<p>The proposed direction of travel is to outsource the management of stocks and stores and a suitable point in the future.</p> <p>The need to create some interim policy/procedure or guidance is accepted so that the stocks and stores can be managed in the interim in order to improve our scrutiny and compliance.</p> <p>Deadline - 31<sup>st</sup> March 2020</p>	<p>Update provided on the 7<sup>th</sup> July 2020 by the Housing Operations Manager confirmed "There have been a few decisions made about this matter both within Adur Homes and with a wider procurement group. An in principle decision has been made to outsource the bulk of our stores purchasing in a potential 3 - 5 year contract.</p> <p>The two decisions remaining will be:</p> <ul style="list-style-type: none"> <li>• How we run down our existing stock and manage risk</li> <li>• The level of threshold stores that we will retain' somewhere between £3K - £10k.</li> </ul> <p>We are significantly adrift of audit timelines at present. The main cause of this has been the delay in appointment of the new Repairs Modernisation Manager post and the impact of Covid".</p>	<p>30<sup>th</sup> September 2020</p>

<p>3.3 The Building Services Team should ensure value for money is sought when purchasing materials.</p>	<p>The Council's Contract Standing Orders requires that where purchases are less than £25,000, it is best practice for a minimum of two written quotes to be obtained.</p> <p>In the absence of a Building Services Procurement Policy or any contract arrangement, we tested 10 recent purchases of materials and noted that, in all cases:</p> <ul style="list-style-type: none"> <li>- The value of the purchase was under £1,000; and</li> <li>- There was no evidence to support value for money was sought in the forms of quotes being obtained.</li> </ul> <p>Where quotes are not obtained, there is a risk that Contract Standing Order requirements are not being complied with and that the Council is not achieving value for money.</p>	<p>Agreed - The proposed direction of travel is to outsource the management of stocks and stores and a suitable point in the future. In the interim the intention is to improve our scrutiny and compliance.</p>	<p>As above</p>	<p>30<sup>th</sup> September 2020</p>
<p>3.5 The stock control spreadsheet should be kept up to date in order that it accurately reflects the current physical existence of materials in both the main storage and operatives' vans.</p>	<p>Maintaining up to date records assists management in ensuring the accuracy of its' stock levels and provides for effective stock management to be implemented.</p> <p>At the time of the audit, the Building Services Team was revamping its stock control processes. We were informed that an exercise was being undertaken to ensure clear and accurate records are being maintained by the Team in respect of stock type and quantity.</p> <p>Where up to date and accurate stock records are not maintained, there is an increased risk of loss or misappropriation of stock, which would result in a direct</p>	<p>Building Services have done some work to revamp processes. Housing Operations Manager to check what the improvements have been insofar as they may resolve some of the action points in the audit report.</p> <p>Deadline - 31<sup>st</sup> December 2019</p>	<p>A check has been made and confirmation given as at 4<sup>th</sup> March 2020 that the stores stock sheet is up to date. There is an outstanding need to address the issue of the full stock on each vehicle. An aim will be to complete this by end of April 2020 at the latest.</p> <p>Update provided by Housing Operations Manager on 7<sup>th</sup> July 2020 – as above.</p>	<p>30<sup>th</sup> September 2020</p>

	financial loss for the Council			
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### Asset Management – (Final Issued March 2020)

Recommendation (Reference & content)	Findings and Risk as outlined in Final Audit Report	Agreed Action, Comments & Original Implementation deadline	Follow Up Comments	Proposed Completion Date
<p>An Asset Management Plan should be produced and approved by the relevant senior management &amp; Member group of the Councils</p>	<p>An Asset Management Plan helps the Councils ensure that corporate assets are used and maintained in an effective and economic manner.</p> <p>It was established that Adur and Worthing Councils do not have an up-to-date Asset Management Plan. The lack of an Asset Management Plan has been identified as a weakness, and tenders were obtained for the production of a corporate asset strategy in May 2019. However, no work in this area has been carried out to date.</p> <p>The absence of an Asset Management Plan has been identified previous audit reports going back to 2011/12.</p> <p>Where the Councils do not have a comprehensive and up-to date Asset Management Plan, there is a risk that assets may not be effectively managed.</p>	<p>Agreed, an Asset Management Strategy has been drafted and is being presented to Joint Strategic Committee for approval in March.</p> <p>Deadline - 31<sup>st</sup> March 2020</p>	<p>No update yet provided.</p>	<p>None set yet.</p>

## Housing Repairs (Mats Processes) – (Final Issued March 2020)

Recommendation (Reference & content)	Findings and Risk as outlined in Final Audit Report	Agreed Action, Comments & Original Implementation deadline	Follow Up Comments	Proposed Completion Date
<p>3.10 Management should review and "Mark as Complete" all jobs sitting in the "Ready for Invoicing" queue, which are over a month old.</p> <p>A process should then be effected whereby queued jobs are reviewed on a monthly basis in order to ensure jobs are completed within the system and paid for in a timely manner</p>	<p>Completed jobs sit in a queue within the Mats system until they are marked as complete by a manager and once this stage is complete invoicing can then occur.</p> <p>Observation of the Repairs Admin queue noted 395 jobs requiring management to "Mark as Complete". Whilst many were recent jobs, we noted that the oldest job (1610613) in this queue was completed on 16 July 2018.</p> <p>When the revised draft report was issued in August 2019 the number of jobs in this queue had risen to 865 (as at 31<sup>st</sup> July 2019).</p> <p>Where completed works are not signed off for invoicing in a timely manner, there is a risk that the Council is not meeting its requirements for paying for goods and service. This may lead to compliant/dispute and reputation loss. There is also the risk of budgetary impact where costs are not paid within the correct financial period.</p>	<p>Agreed, for Building Services this will be Rob Cook but there is a backlog at present due to the Building Services Manager vacancy.</p> <p>The addition of the 4<sup>th</sup> MO will assist in addressing this issue going forward.</p> <p>In order to clear the backlog a Repairs Administrator has being recruited on an 8 week contract which starts on 9<sup>th</sup> March 2020.</p> <p>Deadline - 30<sup>th</sup> June 2020</p>	<p>No update yet provided.</p>	<p>None set yet.</p>
<p>3.19 Digital should be requested to investigate why the Mats Repairs system is not recording user details when actions are occurring/ notes are added to the system.</p>	<p>Assigning user details to actions and notes ensures that the system has an effective Audit trail.</p> <p>From our testing, we noted three Repair Projects (RP2754939, RP2672759&amp; RP5094277) where the Notes are stated as having been added by [System] rather than a specific user.</p> <p>From further testing we also noted:-</p> <p>Six Repair Projects (RP1933403, RP3011363, RP3350663,</p>	<p>This issue will be raised with Digital and if it cannot be resolved as part of "business as usual" updates, it will need to be included within the requirements for Stage 2 development of the system.</p> <p>Deadline - 30<sup>th</sup> June 2020</p>	<p>No update yet provided</p>	<p>None set yet.</p>

Recommendation (Reference & content)	Findings and Risk as outlined in Final Audit Report	Agreed Action, Comments & Original Implementation deadline	Follow Up Comments	Proposed Completion Date
	<p>RP3725361, RP4394937 &amp; RP5340799) where the Events log did not record who the repair was created and approved by.</p> <p>Two Repair Projects (RP2189901 &amp; RP1905453) where the operative details were not shown for pre-inspections.</p> <p>Four Repair Projects (RP2279009, RP2613985, RP3308357 &amp; RP4520841) were the details of who created the job were blank and for project RP4520841 the details of who approved the job are blank.</p> <p>Clarification sought from the Contract Compliance Manager suggested that this appears to be a system bug.</p> <p>Where user details are not assigned to actions, or reported as such, there is a risk that the system's audit trail is ineffective.</p>			

### Rent in Advance/Rent Deposit Scheme – (Final Issued March 2020)

Recommendation (Reference & content)	Findings and Risk as outlined in Final Audit Report	Agreed Action, Comments & Original Implementation deadline	Follow Up Comments	Proposed Completion Date
<p>3.3 Every form used in the Rent in Advance/Rent Deposit (RiA/RD) process which is used to collect the personal data of the client (and/or their family members) needs to be reviewed and a relevant privacy notice added.</p> <p>Furthermore, where personal data is collected and recorded within forms and the Councils are relying on a client's consent to process the information then the relevant consent(s) need to be obtained.</p>	<p>The Data Protection Act (DPA) 2018 and General Data Protection Regulation (GDPR) contain specific requirements that the Councils must comply with when collecting and processing a client's personal data, including obtaining consent and providing privacy notices.</p> <p>From our examination of the 'In Principle Financial Assistance Approval' and 'Vulnerability &amp; Suitability' forms we noted that neither contain any details about consent or a privacy notice.</p>	<p>These forms are part of the homelessness prevention process and are therefore covered by the consents given when a homelessness application is made. The Homeless application form also includes the link to the Councils privacy notice which specifically relates to homelessness related processes.</p> <p><b>Audit Comment</b> – Advice sought from the Councils SIGO has</p>	<p>No update yet provided.</p>	<p>None set yet.</p>

Recommendation (Reference & content)	Findings and Risk as outlined in Final Audit Report	Agreed Action, Comments & Original Implementation deadline	Follow Up Comments	Proposed Completion Date
<p>The Housing Needs Manager should liaise with the Councils' Senior Information Governance Officer (SIGO) in order to effect this.</p>	<p>As some of the information required to be provided in the 'Vulnerability &amp; Suitability' form can relate to disabilities or illnesses, the personal information being provided is considered sensitive personal data and is therefore subject to more rigorous requirements under the DPA 2018. Furthermore, as sensitive personal information relating to any other residents in the same dwelling as the client is also being requested, separate privacy notices for these other residents will also be required.</p> <p>Where the required consent and privacy notices are not contained on forms, the Council is in breach of the DPA 2018 and GDPR and should the ICO investigate this the Council may face significant fines.</p>	<p>confirmed a privacy notice link is required on all forms which are used to collect personal data and that depending on the process, consent information may also be required. Therefore we recommend that the SIGO is contacted in order to review the process and confirm whether consents are required within these forms.</p> <p>Housing Needs Manager – Agreed</p> <p>Deadline – 30<sup>th</sup> June 2020</p>		