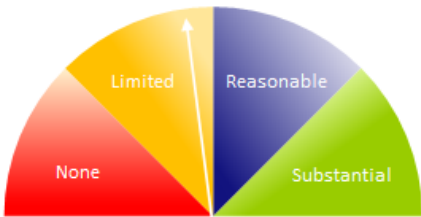


**Audit Objective**

To ensure that that the authority fulfils its statutory obligations as per the relevant regulatory standards and legislation and their own agreed protocols.

**Assurance Opinion**



Limited (High) - Significant gaps, weaknesses or non-compliance were identified. Improvement is required to the system of governance, risk management and control to effectively manage risks to the achievement of objectives in the area audited.

**Number of Actions**

Priority	Number
Priority 1	2
Priority 2	1
Priority 3	1
<b>Total</b>	<b>4</b>

**Risks Reviewed**

Failing to meet all applicable statutory requirements providing for the health and safety of the occupants in Powys County Council Housing Stock.

*It should be noted that above risk has recently been removed from the Corporate Risk Register.*

**Assessment**

**High**

**Key Findings**

	<b>Policies</b> – the policies are overdue a review (based on their date) and have no clear version control present, which could result in the wrong procedures being followed leading to anomalies within performance and data held.
	<b>Reporting</b> – comprehensive reports are produced on a regular basis that report both on current performance and any outstanding issues or actions.
	<b>Data input and Maintenance</b> - There is a large amount of manual intervention and officer time required to maintain the independent spreadsheets that are held for each facet of the maintenance program, this could result in key pieces of data being omitted which is evident.
	<b>Data Quality</b> – data is inconsistent throughout the numerous spreadsheets (registers) that are maintained. The individual service registers did not match with the master list provided by the Housing Admin Officer. Some registers were missing properties that were on the master list and some had properties on the register that did not appear on the master list. This could result in properties not undergoing the annual maintenance, or servicing properties that no longer belong to Powys.
	<b>Inspections</b> - Not all inspections are undertaken within the allotted time requirement to comply with the relevant regulatory standards and legislation and their own Council Housing Repairs and Maintenance Policy by which they are governed. The lack of compliance potentially puts the health and safety of the occupants in jeopardy.

**Audit Scope**

This will be an assurance audit focusing on the reporting and administration of Housing Statutory Compliance within the Council. The audit will undertake a walkthrough of the process alongside an analysis of records to identify any potential areas of weakness.

Key objectives of the review are to provide assurance that the council are performing their statutory requirements with regards to ensuring the health and safety of the occupants in their housing stock:

- Ensure regular servicing checks are completed by a registered company
- Ensure carbon monoxide and smoke alarms are present and maintained in all properties.
- Ensure the asbestos register is up to date and regularly reviewed

These terms of engagement set out the scope and coverage of the review but should not be regarded as an exhaustive programme of work and initiative and discretion will be used.

## Background Information and Introduction

**HOWPS** – in recent years, housing statutory compliance was contracted out to HOWPS as part of a joint venture with Powys County Council. This meant that statutory compliance was controlled by them, but ultimately the responsibility was with Powys County Council to ensure all housing stock had the appropriate checks in place. In July 2022 the joint venture was terminated, and all responsibilities were handed back to the Housing department.

**Housing Stock** - There are various prefixes used to identify the housing stock, not all of these are permanent assets as some are used on an ad hoc basis (such as B&Bs). Therefore, all testing was based around the DW prefixed properties. It should be noted that the authority still has a duty of care to ensure that all the other properties have the appropriate statutory checks in place. A list of all housing stock was requested which listed 5500 properties, during the audit process it became apparent that not all the departments were using the same stock list to form the basis of their workload.

**Audit Review** - The followings were also partially reviewed as part of the audit:

- Asbestos
- Fire Doors
- Fire Extinguishers
- Emergency Lighting
- Block Inspections
- Sewerage

Unfortunately, due to the way the information was stored it was not easy to undertake complex analyses in the allotted time for the audit, therefore this will be reviewed in the new year as a separate audit.

**Data** - It should be noted that all findings and statistics quoted within the report are a representation of the position at the time of the audit (February 2023), it is acknowledged that due to the nature of the work, this is a constantly moving position. It is envisaged that a follow up audit will take place later in the 2023/24 financial year.

**Going Forward** – The team are heading in the right direction and there is the desire and willingness within the Housing Compliance Team to achieve 100% compliance, they are being held back by the current set up. The housing system (QL) does not provide all the features that are essential from such a system (such as document storage) which has resulted in the individual teams coming up with work arounds to store all the data, this has then resulted in various versions of data being independently stored, one version of the truth is required to achieving their goal and to become more efficient and effective.

Appendix 1

Findings & Action Plan

Policies	Action												
<p>The Council Housing Repairs and Maintenance policy is dated May 2017 and therefore a review is overdue. There is no version control on the document.</p> <p>This could lead to officers using the wrong processes resulting in inconsistencies in the working practice.</p>	<p>Policies to be reviewed and version control to be added. Add to the Corporate Policy Repository when complete.</p> <table border="1"> <tr> <td>Priority</td> <td>3</td> <td>SWAP Reference</td> <td>AP#943</td> </tr> <tr> <td>Responsible Officer</td> <td colspan="3">Henk Kuipers – Policy Officer</td> </tr> <tr> <td>Timescale</td> <td colspan="3">Sept 2023</td> </tr> </table>	Priority	3	SWAP Reference	AP#943	Responsible Officer	Henk Kuipers – Policy Officer			Timescale	Sept 2023		
Priority	3	SWAP Reference	AP#943										
Responsible Officer	Henk Kuipers – Policy Officer												
Timescale	Sept 2023												

Reporting
<p>The Compliance and Quality Assurance Manager regularly reports on the following: Fire Safety - Fire Risk Assessments, Lift Operations and Lifting Equipment Regulations, Asbestos, Legionella, Fixed Electrical Tests, Sewage, Heating Systems and Smoke Alarms.</p> <p>The reports contain the number of properties tested in the period, any issues that have occurred due to the inspections, it also has a table for each facet that lists compliant and non-compliant properties. The report also outlines the standards that must be achieved to comply with the WHQS and the in-house policy. Any required actions are listed for actioning.</p>

Data Input and Maintenance	Action												
<p>There is no specific piece of software that is used to store all the statutory compliance details in one place, instead each facet of the statutory compliance has its own set of data in the format of a spreadsheet and the use of SharePoint site that they store the details and certificates on.</p> <p>It was stated that this is a time-consuming process that has resulted in a backlog of data that has not been recorded, it also means that there is the potential for each area to record different items of data which could result in inconsistencies or omissions.</p> <p>One version of the truth would allow all officers involved in the process to become more consistent and efficient.</p>	<p>A review will be undertaken for all facets within the compliance team to ascertain their current work processes and then establish a new process for all to follow.</p> <p>Explore interim use of Technology Forge or other appropriate system.</p> <p>A new system is to be implemented by 2025/26 using the new cleansed data from the process above to inform the new system.</p> <table border="1"> <tr> <td>Priority</td> <td>2</td> <td>SWAP Reference</td> <td>AP#943</td> </tr> <tr> <td>Responsible Officer</td> <td colspan="3">Compliance &amp; Quality Assurance Manager</td> </tr> <tr> <td>Timescale</td> <td colspan="3">March 2024</td> </tr> </table>	Priority	2	SWAP Reference	AP#943	Responsible Officer	Compliance & Quality Assurance Manager			Timescale	March 2024		
Priority	2	SWAP Reference	AP#943										
Responsible Officer	Compliance & Quality Assurance Manager												
Timescale	March 2024												

Full details of our audit testing are available upon request. Our audit assurance framework and definitions can be found here ([www.swapaudit.co.uk/audit-framework-and-definitions](http://www.swapaudit.co.uk/audit-framework-and-definitions))

Data Quality	Action		
<p>The fact that separate spreadsheets are being created has led to inconsistencies with regards to the number of properties that they have in their individual registers. A ‘master list’ of housing stock was requested from the Housing System Administrator to compare to the details that each section uses. The following anomalies were noted:</p> <p><b>Servicing</b> – there were 15 properties that appeared on the master list but did not appear in the service register. There were also 4 properties that appeared on the service register but did not appear on the master list.</p> <p><b>Smoke Alarms</b> - there were 37 properties that appeared on the master list but did not appear in the service register. There were also 5 properties that appeared on the service register but did not appear on the master list.</p> <p><b>CO2 and Asbestos</b> – because not all properties would necessarily fall into these categories no comparison was completed.</p>	<p>Work is being undertaken on developing a servicing contractor and aim to work on a 10-month cycle of inspections when in place.</p> <p>Third party contractors are now assisting with compliance and figures will have improved since the time of the audit. Weekend working is being considered to allow access to properties where working hours is not possible.</p> <p>The data will be reviewed again, and any overdue properties will be addressed.</p> <p>Service Registers and Master Lists to be aligned.</p> <p>Resource to be deployed to cleanse data and align records to allow for accurate working until new ICT system in place.</p> <p>Stock Condition Survey to be commissioned in 2023-2024 (aiming for 100% coverage) to provide an up to date and definitive understanding of the assets, including all attributes, held and managed by Housing Services. This will run in parallel with the introduction of the new ICT system for Housing Services (scheduled for 2025-2026) which will be designed to avoid the need for operational workarounds that have inadvertently contributed towards the data glitches identified in this audit report. The SCS and the ICT projects will adopt a Project Board approach to governance to make sure that the outcomes required (up to date and ongoing accurate knowledge of all assets, a reliable and user-friendly ICT system) occur.</p>		
	<b>1</b>	<b>SWAP Reference</b>	AP#421
	<b>Responsible Officer</b> Compliance & Quality Assurance Manager (SCS and ICT – Housing Senior Management Team)		
	<b>Timescale</b> March 2024		

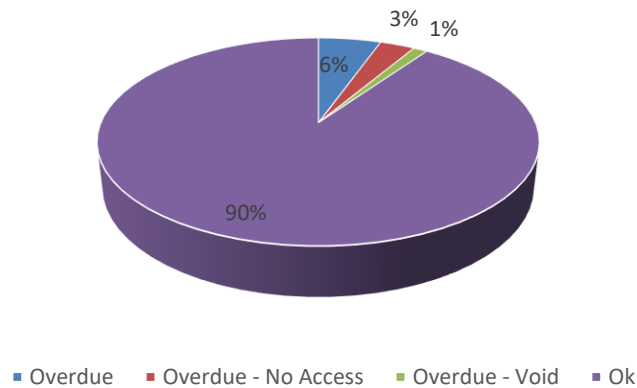
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Inspections	Action												
<p>An analysis was undertaken on the data that was provided by the Housing Department. The following anomalies were noted:</p> <p><b>Servicing</b> – there were 535 properties in total that were overdue an inspection, this consisted of 67 properties which had a void status, 168 properties where access has been denied and 300 that were tenanted.</p> <p><b>Smoke Alarms</b> – there were 39 properties in total that were overdue an inspection and 13 properties that had the inspection date missing in the data. The 52 properties consisted of 6 properties which had a void status, 2 properties that were missing a status and 44 properties that were tenanted.</p> <p><b>CO2</b> – there were 209 properties in where the replacement of existing equipment was overdue, this consisted of 177 properties that was overdue replacement and 32 properties where the expiration date was missing. There were 748 properties where the current equipment was overdue an inspection and 79 properties where the inspection date was missing.</p>	<p><i>Linked to the Data Quality action above</i></p> <table border="1" data-bbox="1137 654 2119 790"> <tr> <td><b>Priority</b></td> <td><b>1</b></td> <td><b>SWAP Reference</b></td> <td>AP#942</td> </tr> <tr> <td><b>Responsible Officer</b></td> <td colspan="3"><i>As above</i></td> </tr> <tr> <td><b>Timescale</b></td> <td colspan="3"><i>As above</i></td> </tr> </table>	<b>Priority</b>	<b>1</b>	<b>SWAP Reference</b>	AP#942	<b>Responsible Officer</b>	<i>As above</i>			<b>Timescale</b>	<i>As above</i>		
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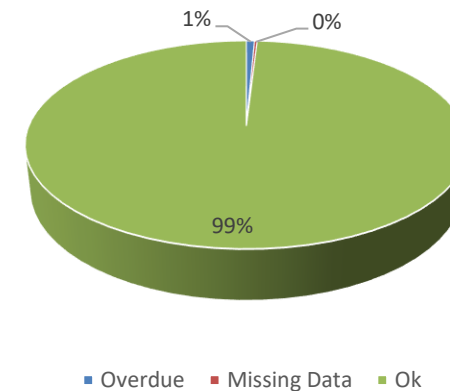
Any graphs and calculations below are based on the stock figure of 5500 properties as supplied by the Housing Admin.

The graphs below are a breakdown of the properties that are overdue an inspection, this can be attributed to void properties, properties where access has been denied by the tenant or just simply not been completed. Denied access is followed up by the issuing of various letters, each gradually increasing in severity, and failure to comply can ultimately lead to the termination of their tenancy and eviction. The percentage of properties that are overdue inspections is relatively low, but unfortunately due to the nature of the work, if there was a serious incident at just one of these properties the consequences would have a huge impact on both the officers involved and the authority.

Servicing



Smoke Alarms



A random sample of 25 properties were selected and the current and previous servicing compliance certificates were requested. The results were:

- 21 of the properties had both years certificates on file.
- 1 property had previous years certificate and was now marked as non-access on the system.
- 1 property had previous certificate but had been void for a considerable time since.
- 1 property was overdue and booked for inspection in near future.
- 1 property was overdue and was deemed as a complex site that needed addressing.