

SARTH Audit Actions

No.	Findings and Implications	Service Comments	Action Taken/Progress	Complete
1 (R)	<p>Errors have been identified relating to the application date and category allocation date within the Capita system. This poses a risk that the applicant's position within the short-list is not accurate.</p>	<p>An exception report was in place to identify any applications where the category allocation date was different to the application date allow these to be reviewed and corrected if necessary.</p> <p>This report was ran periodically but was not scheduled to be ran frequently to mitigate the risk of an error.</p>	<p>Exception report is now automatically scheduled to run weekly. Evidence of this has been supplied to Audit and confirmation has been given that this fully completes this action.</p>	<p>Implemented in August 2017</p>
2 (R)	<p>There is not enough evidence to support the allocation overrides on the capita system. Although each allocation agent is required to apply an override code, the sample reviewed identified incorrect override codes were being utilised and insufficient documentation was available to support the override. This poses a risk that in the event of an inquiry from the ombudsman, the Council is unable to support its reasons why an applicant has been overridden for a property.</p> <p>Additionally, there is no formal review of housing allocation overrides by management to identify overall volumes, process improvements or training requirements.</p>	<p>An override report to be run monthly on all applicants who have been bypassed for a property and a sample check to be conducted to ensure the reason for the override is adequate and the override code utilised is correct and evidenced. Any issues identified through review to be fed-back and application errors rectified.</p>	<p>Since October 2017, an override report is run and all overrides are checked by the Team Leader to ensure the applicant has been bypassed in line with procedure. It is recognised that there is a need for some applicants to be bypassed, for example, when a property has been substantially adapted or a sensitive let is required. It was felt important that all overrides are checked to ensure compliance however this may be reviewed in time to sample 50% of allocations for each Housing Officer. It is pleasing to note that of all overrides checked, 100% have been in line with procedure and no concerns raised.</p> <p>The override report will be included in Housing Services performance framework and submitted to CEMT and</p>	<p>Implemented in October 2017</p>

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			Housing & Regeneration Programme Board for monitoring purposes. Also included on Housing risk register to be reviewed.	
3 (A)	The appeal procedure does not detail the time frames set out for dealing and resolving appeals. Additionally, there is no reporting on the volume, reasons and outcomes of appeals to identify process improvements or training opportunities.	<p>The policy is a regional policy and all amendments have to be agreed by all SARTH Partners.</p> <p>The revised final draft of the policy is now in with all partners to be formally agreed.</p> <p>Please note the revised policy cannot be formally published until all partners have agreed the content and any delays on this are outside of Flintshire County Council's control.</p>	<p>The procedure for appeals has now been included in the policy and details the timescales for dealing with and resolving appeals.</p> <p>In addition to this the Housing Register is recording all appeals and outcomes to ensure that appeals are dealt with in timescales given and also to enable improvements to the process through monitoring of lessons learnt.</p>	<p>In Progress</p> <p>Implemented July 2017</p>
4 (A)	Band 1 applications are not always being pre-checked as required by the SARTH procedures. Completion of the verification form and landlord references are a key control to demonstrating the highest priority banding has been correctly assigned.	Pre-tenancy assessment and landlord references to be completed for all Band 1 applications as required by SARTH and evidence retained within the Capita system for audit purposes. A procedure to be defined to advise what action should be taken in the event of non-receipt of landlord references.	<p>Pre-tenancy Assessments are being carried out for all applicants. This is now also included in performance suite for Housing Services as a KPI.</p> <p>Procedure for non-receipt of landlord references is currently being developed however, will not impact on an allocation of a property.</p>	By 31 January 2018
5 (A)	Allocation offer letters are not always available to support the offer of properties to applicants. This poses a risk that individuals may contest their application being cancelled due to two	Allocation offer letters will be retained within the housing system Capita for audit trail purposes.	All offers are supported by written letter and this is scanned on to application.	Implemented December 2017

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6 (A)	<p>unreasonable refusals.</p> <p>Periodic reviews of applicants' details and personal circumstances are not being conducted in line with agreed timescales. This poses a risk that applicant information and circumstances are not up to date to reflect their priority on the housing allocation list and to comply with the Data Protection act 1998. The Connects Manager has advised they are currently behind on their periodic reviews as they have had some resource challenges and seen an increase in the demand for the service. As such, she has prioritised activities to be completed by the team based on impact to applicant and risk to service.</p>	<p>While it is accepted that not all reviews have been undertaken within the agreed timescale the level of risk of an incorrect allocation is low. All applicants have a pre tenancy assessment by the potential landlord before being allocated a property and any change of circumstances would be picked up by the allocating officer at this time.</p> <p>The purpose of the review is to ensure applications are up to date and accurate to help speed the pre tenancy assessment up and enable the letting process to progress quickly.</p> <p>The Housing Contact Centre and The Housing Solutions Contact Centre are due to merge into one single contact centre and it is here that Housing Register calls will be answered. Once fully set up the call centre staff will be trained to complete reviews housing applications with applicants when they call to make enquiries/changes to their application. This will reduce the number of scheduled reviews that need to be completed and will also reduce duplication for those customers we have already had</p>	<p>Monitoring of reviews has now commenced to better understand the value of this process. The Housing Register Team are monitoring all reviews sent out vs the number of review forms returned and out of these how many applicants have had changes in circumstances.</p> <p>Single Housing Contact Centre to start completing reviews with applicants via the telephone as a standard practice following set up early January and completion of system training.</p>	<p>By March 2018</p> <p>By February 2017</p>

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		<p>recent contact with.</p> <p>Enquiries have been made with supplier about introducing more automation to reduce the need for manual interventions for this process.</p>	<p>Awaiting feedback from Supplier regarding possible enhancements and costs. Work will then need to be scheduled with FCC ICT Teams.</p>	<p>TBC</p>
7 (A)	<p>Management oversight of the housing allocations process is not adequate. A quality assurance process has been recently introduced but the methodology for the review has not been defined and agreed.</p>	<p>A risk based quality assurance process will be devised and documented to include:</p> <ul style="list-style-type: none"> <li>• sampling methodology</li> <li>• number of reviews to be completed per new housing allocations officer</li> <li>• timescales for review and feedback</li> <li>• reporting on issues identified/trend analysis</li> </ul>	<p>A sampling methodology has been agreed and implemented – 50% of allocations per New Customer Housing team. Any concerns found are raised immediately with the relevant officer and on-going review at monthly staff 1:1's to monitor. Quality assurance to be included in Housing Services performance suite as a KPI.</p>	<p>By December 2017</p>
8 (A)	<p>Both the Housing Solutions Team, who assign a band to the housing applicant, as well as the new customer team members have the facility to make changes to an application which could impact an individual's position on the housing allocation list. This poses a risk that data may be intentionally manipulated to expedite certain individuals within the housing allocation list. This issue was raised in the last review.</p>	<p>This issue was raised on the last audit and it was agreed at that point in time that separation of these duties were not required or in the best interests of the service. It was agreed that fully restricting access would cause unnecessary duplication and reduce the ability for officers to offer resolution at first point of contact. Management felt that senior officers should be able to work with a degree of trust and that as long as there was adequate monitoring of the service, i.e</p>	<p>Access to maintain/edit an application has now been restricted to Housing Register and Contact Centre Teams only.</p>	<p>Implemented December 2017</p>

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		<p>random allocation checks, that this could be managed effectively.</p> <p>Since the original SARTH audit there has been significant changes to the Housing Management and Housing Register Team Structures and on review of this action following these changes along with the planned provision of a single contact centre that will deal with all initial enquiries it is now felt that separation of duties has been naturally introduced. Therefore restricting the access on the systems would no longer cause any operational issues or unnecessary duplication.</p>		
9 (G)	Staff are unaware of the Anti-Fraud and Corruption Policy as well as the Fraud Response plan. This poses a risk that in the event of fraud, they are unaware of what action should be taken.	<p>Following the original audit recommendations all relevant staff were issued with the appropriate parts of the Code Of Conduct. These were signed as read and understood by staff and copies retained on staff files.</p> <p>This action refers to a different policy that was not previously highlighted.</p>	All relevant staff have now been issued with the Anti-Fraud and Corruption Policy along with the Fraud Response Plan.	Implemented December 2017
10 (G)	Timescales for the cancellation of applications due to non-receipt of evidence are not always adhered to. Testing identified a number of occasions where the 28 day SLA's had not been adhered to.	While it is accepted that not all applications have been fully cancelled within the agreed timescale the level of risk is low as these applications are suspended on the system	Enquiries are being made with the Supplier to identify if this part of the process can be automated and therefore remove the need for manual	By June 2018

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		<p>and would not therefore show on a shortlist. There is therefore no risk that an applicants that should be cancelled could be allocated a property. It is for this reason that the service deemed this a low risk area and focussed resources available on more critical parts of the service.</p> <p>This is a manual process that requires an officer to manually access each suspended application and complete the cancellation. Automation of this process is being investigated with the supplier to reduce the requirement for this to be done manually.</p>	intervention.	
11 (G)	There is currently no definition of the terms 'Unreasonable Refusal' or 'Withdrawn' to assist Housing officers with the consistent application of the process. This poses a risk that there is a lack of consistency on how individuals on the housing list are treated.	<p>All SARTH procedures and guidance is currently being reviewed regionally.</p> <p>It was agreed by all partners to commence the review of the procedures and guidance after the policy review was completed to enable the new versions to reflect any changes made in the policy.</p>	<p>The draft policy was agreed in principle in November 2017 and work has since commenced to review/update all procedures and associated guidance.</p> <p><b>REGIONAL GROUP WORK</b></p>	By June 2018
12 (G)	A procedure is currently not in place to assist the Housing Officers with the allocation of Direct Lets properties.	A procedure to be drafted to provide guidance on the allocation of Direct Lets properties. Evidence to be retained in Housing V.12 for audit purposes.	Direct Let functionality restricted to Team Leaders and Manager. Procedure and guidance is currently being drafted for staff.	By February 2018

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13 (G)	A user can have an unlimited number of attempts to log into the RSL portal without the account being locked. There is also a requirement for password changes every 30 days. Both these issues are not in line with the National Cyber Security Centre Password Guidance.	This was investigated following the original SARTH audit and was agreed low ICT priority as low risk due to the requirement for all staff to log in via a complex password/secure checks before being able to access the Housing system.	Currently being tested and planned for Implementation into live system January 2018.	By November 2018