

INTERNAL AUDIT REPORT



LANDLORDS HEALTH AND SAFETY 2019/20

Issue Date:	11 th November 2019	Issued to:	Pranali Parikh – Director of Growth and Regeneration
Author:	Milda Cufi – Senior Auditor		Stuart Grabham - Housing and Commercial Asset Manager
			Duncan Watson - Senior Surveyor & Facilities Officer
			Albert Wilson - Housing, Welfare & Safer Communities Manager
			Sarah Jane O'Connor - HR and Communications Manager
			Roger Cornish – Health and Safety Officer
			Dawn Garton – Director for Corporate Services <i>(Final Draft and Final Report)</i>
			Edd de Coverly – Chief Executive <i>(Final Report)</i>
			Keith Aubrey – Deputy Chief Executive <i>(Final Report)</i>
			Adele Wylie - Director for Legal and Democratic Services

LANDLORDS HEALTH AND SAFETY 2019/20

EXECUTIVE SUMMARY

1. INTRODUCTION & OVERALL OPINION

As a landlord, Melton Borough Council (MBC) has a number of statutory responsibilities including fire safety, asbestos management, electrical safety, gas safety and water safety. Following issues identified regarding fire safety, the Director for Growth and Regeneration requested a review by Internal Audit to provide assurance that the Council is fulfilling its duties in ensuring all aspects of safety of these properties. Concerns from the current leadership team regarding apparent long standing issues with compliance with wider property safety also resulted in this being recognised on the Council's strategic risk register in January 2019.

It has been noted that compliance with fire safety in particular has been a focus for the Council over the last year with reports to the Council's Place Committee in June 2018 and Corporate Committee in January 2019 and a new Fire Safety Policy being adopted in January 2019. Officers have also been preparing a comprehensive Housing Improvement Plan (HIP) which would represent a significant investment in housing services. This is due to be considered by Council in November with a key focus on safety of housing assets. The proposed corporate restructure being considered by Council in November also proposes establishing a designated housing function.

A key finding of this audit has been the historical weaknesses in data collection, retention, management and application in decision making process related to property safety. It has been highlighted that the Council currently holds no central asset register, record of housing property inspections or a list of actions identified through inspections and assessments that need to be implemented to achieve full compliance. A comprehensive dataset must be compiled, updated and maintained to ensure consistency and to facilitate effective monitoring. Sample testing has highlighted a number of gaps and weaknesses in the current inspection regimes and failure to ensure all inspections have been completed in line with policy and legal duties, where applicable.

Sample testing highlighted a lack of consistent compliance with Council policy for housing properties in relation to fire risk assessments, electrical inspections and asbestos surveys. Statutory annual gas safety checks had been undertaken for all properties in the audit sample with the exception of one case, where the gas safety check was found to be overdue at the time of the audit. Officers have since arranged for the check to be completed by the contractor and provided evidence of the completed gas safety inspection.

Internal Audit selected a sample of housing blocks to establish if annual Fire Risk Assessments (FRA) were completed. It was noted that a FRA was completed in all cases, however in 60% of cases this was now overdue, with the last inspection carried out more than twelve months ago. Officers confirmed that FRAs for all blocks with communal areas have been commissioned and are being undertaken with a view to create a new baseline and assess the extent of works required. This work is due to be completed by the end of October 2019.

In regards to the electrical safety inspections, in sample testing 45% of housing stock selected had been subject to an electrical inspection in the last five years, 7% had received the inspection but more than five years ago and for the remaining 48% there was no record of any electrical inspection. It was also noted that currently no regular asbestos inspections are being undertaken on the housing properties, but Internal Audit are advised that these are undertaken on rewiring and voids properties and any other repair works that are likely to cause disturbance.

Crucially, it was further highlighted that historically the issues arising from Fire Risk Assessments, electrical inspections and asbestos surveys have not been feeding into work plans. Therefore, where observations were recorded and recommendations made as a result of the inspections, these had not been suitably recorded and/or monitored to ensure the issues were promptly rectified. As such, there is no evidence that issues noted in the inspections have been resolved and these should be addressed as a matter of priority given a number of cases, such as electrical installations, had been classified as ‘unsatisfactory’ due to the issues arising. Whilst outside of the sample selected for audit testing, the Council have advised that there are three further blocks where the Council had received informal notices from Leicestershire Fire and Rescue Services (LFRS) and that all actions arising from those action plans have been implemented. Regarding the issues arising from the new FRAs, officers confirmed that contractors have been procured in readiness to start works on site once the actions are agreed and works are to be scheduled following the FRAs.

Whilst health and safety of housing properties has been recognised as a corporate risk, currently there is no mechanism for monitoring performance against policy or service standards. It is recommended that performance reporting be introduced to identify any areas of non-compliance and ensure prompt actions are taken.

A central record of training is not in place making it difficult to identify training needs of the housing assets team. Also, there is no process in place to identify the qualifications required by the contractors and consultants through procurement processes. To ensure that members of staff as well as contractors are suitably qualified, evidence of competence should be obtained at the recruitment and procurement stage. Considering that safety is the responsibility of everyone involved, awareness needs to be raised among the tenants, visitors and staff as well as TFEC members.

It is also noted that a compliance officer post was created in April 2019 within the assets team. Following a failed attempt to recruit, the job description is being revised and re-evaluated. This should be recruited urgently to ensure competent and capable personnel are in place manage this high risk area.

In summary, this audit report identifies a number of issues and proposed remedial actions in relation to compliance with property safety in housing assets. It demonstrates the scale and range of issues the Council is facing. It acknowledges the plans being put in place to reduce the risk of the negative impact on Council’s reputation, finances and more importantly the safety of tenants, visitors and Council staff. It highlights that urgent actions are required to achieve the recommendations of this report.

Internal Audit Assurance Opinion			
Control Environment	Limited ●		
Compliance	Limited ●		
Organisational Impact	Major ●		
Risk	High	Medium	Low
Risk 1 - Reputational and/or financial damage due to non-compliance with legislative requirements and council policy.	1	2	2
Risk 2 - Residents, contractors, visitors or staff are seriously harmed due to unsafe living conditions.	4	1	1
Total Number of Recommendations	5	3	3

2. SUMMARY OF FINDINGS

Risk 1: Reputational and/or financial damage due to non-compliance with legislative requirements and council policy.

A number of the Council's statutory responsibilities regarding the safety of its residents are set out in the Regulatory Reform (Fire Safety) Order 2005, Health and Safety at Work Act 1974, Control of Asbestos Regulations 2012, Gas Safety (Installation and Use) Regulations 1998, Electrical Equipment (Safety) Regulations 1994 and Housing Act 2004. The Council has a general Health and Safety Policy in place that governs the overall health and safety requirements as well as other policies specific to landlord's health and safety responsibilities, such as legionella management and asbestos policies. The Fire Safety Policy covering all Council owned properties was approved by the Corporate Committee on 30th January 2019 and outlines the Council's approach to risk assessments in line with the Management of Health and Safety at Work Regulations 1999 and the Health and Safety at Work Act 1974. There is no gas safety checks policy in place, only a gas and oil servicing procedure is available that sets out the arrangements that should currently be in place for annual gas checks. Also there is no policy on electrical safety management. The existing policies and procedures could also be further strengthened to reflect the wider audit findings such as clearly setting out the process to be followed in relation to any inspection outcomes as well as specifying the inspection frequency in line with the statutory requirements, where applicable (**see recommendation 1**).

In order to ensure that health and safety checks are carried out appropriately, those conducting the checks must be suitably trained. Whilst most of the checks that the Council undertakes as a landlord are carried out by its appointed contractors, some checks are also undertaken by relevant staff. Legionella and asbestos awareness training modules are currently available on the Council's online training portal, MIKE. Training completion reports from MIKE show that 19 members of staff across the Council have completed the asbestos online training module and a further 14 officers Council-wide had completed the legionella online training. To ensure that members of staff are suitably qualified, evidence of employee competence should be obtained at the recruitment stage. A central training register for all officers involved in carrying out the checks/inspections should also be developed. The register should identify mandatory training and be regularly updated and monitored to ensure all staff receive appropriate training before undertaking relevant checks (**see recommendation 2**).

During audit testing on a sample of housing properties it was also identified that evidence of contractor competence was not available for a sample of contractors that had undertaken fire risk assessments, asbestos or legionella checks that had been completed on the Council's behalf (**see recommendation 3**). This has now been acknowledged by management and the recent award of a contract for new fire safety assessments is understood to have included assurances over contract competencies.

Tenancy agreements outline the roles and responsibilities of both residents and the Council in relation to health and safety. There is a Tenants Forum Executive Committee (TFEC) which is made up of tenants from across the borough and meets on a regular basis to discuss housing issues that affect all tenants. A tenant's handbook is also available and provides useful guidance on keeping your home safe including advice on fire safety. It was noted that no guidance on water safety could be seen in the tenant's handbook or tenancy agreement. The Health and Safety Executive advises landlords to inform tenants on matters such as not adjusting the temperature setting of the calorifier, to regularly clean showerheads and inform the landlord if the hot water is not heating properly or there

are any other problems with the system so that appropriate action can be taken. This could be incorporated in the tenant's handbook to assist tenants in managing health and safety risks (**see recommendation 4**).

There is currently no complete record of all inspections carried out at each housing property for which the Council is responsible. Evidence of checks are held in variety of ways with a lack of consistency in record keeping which has led to an inability to identify those requiring checks and monitoring of outcomes.

At the time of audit:

- Annual gas checks and fire risk assessments are recorded on a spreadsheet;
- There is no central record of all electrical inspection carried out by property. Individual electrical inspection certificates are saved in the relevant network folders. .
- No checks on asbestos are being carried out at MBC at this time except for voids, fire risk remedial works, rewiring and any repair works where there is a risk of asbestos being disturbed. Some records on previous surveys are held in the relevant network folders as there is no central record of surveys undertaken by property;
- Legionella checks are undertaken on sheltered housing schemes and housing blocks with communal water systems, there is no requirement to undertake legionella risk assessments on single dwellings. Evidence of risk assessments undertaken are held in the relevant network folders and there is no central register.

All inspection records should be held and recorded centrally to ensure a full picture of all properties and assist in identifying and prioritising any remedial works and re-checks required (**see recommendation 5**).

Based on the above findings, the overall assurance rating for the design of controls is **Satisfactory Assurance** and the rating for compliance with controls is **Limited Assurance**.

Risk 2: Residents, contractors, visitors or staff are seriously harmed due to unsafe living conditions.

The Council has a Risk Management Policy, reviewed in March 2019. The policy requires that general risk assessments are carried out on all Council workplaces and on all activities organised by the Council. To ensure that risks are captured and managed appropriately the risk assessment template has been designed. This would benefit from being made readily available to all staff on the shared network 'MIKE' to ensure members of staff use the latest form and abide by the current procedures.

The risk assessments register is maintained by the Health and Safety Officer to record each risk assessment completed and its review due dates to ensure risks within the Council are monitored and appropriately managed. Review of the risk assessment register confirmed that up to date risk assessments covering core contractors, electrical safety and fire risks are available. In addition, management policies and procedures on how the Council deals with and manages the risks associated with asbestos, water and gas safety are available. These policies should be reviewed on a regular basis to ensure they remain fit for purpose.

The Council is required to undertake gas safety checks on an annual basis to meet the legal and regulatory obligations required under the provisions of the Gas Safety (Installation and Use) Regulations 1998. Evidence was available to confirm that all gas safety checks selected had been undertaken by qualified Gas Safe registered

engineers. Internal audit selected a sample of single dwellings and housing blocks for detailed testing. Gas safety checks were found to have been completed in all but one (4%) cases – this related to one housing block which had not been subject to an inspection within the last twelve months. It must be noted that upon being notified of this by Infernal Audit, officers promptly instructed the contractor to complete the inspection and at the time of reporting have provided evidence of this check being completed (**see recommendation 6**). This case highlighted a weakness in project handover arrangements and compliance with Construction, Design and Management (CDM) procedures and lessons should be learnt from this (**see recommendation 7**).

The Landlords and Tenants Act (1985) requires that the electrical installation in a rented property is safe when a tenancy begins and maintained in a safe condition throughout the tenancy. In order to comply with this Act, the Council needs to arrange for a registered electrician to carry out an Electrical Condition Report (EICR) on Council let properties. Evidence was held that the contractors used to undertake these checks are suitably approved and regulated.

The Council does not currently have a policy in relation to electrical safety, hence the policy on frequency of inspections is not formally set out. In accordance with the UK Standard for the safety of electrical installations for rented accommodation, the maximum period recommended between the inspections is five years. In audit sample testing, 45% of housing stock selected had been subject to an electrical inspection in the last five years, a further 7% had received an inspection but more than five years ago – for the remaining 48% there was no record of any electrical inspections. Officers explained that a contractor was appointed in June 2018 to carry out electrical tests and re-wire 629 properties as part of the five year check programme. A total of 226 properties have been completed from July 2018 to June 2019. The rewiring programme is due to complete by October 2020.

Following any electrical inspection, observations are recorded and recommendations may be made which must be addressed to ensure compliance with the electrical safety regulations. In 17% of cases (where an inspection was carried out) the electrical inspection certificates showed that the overall assessment of the installation in terms for its 'suitability for continued use' was 'unsatisfactory'. This means that issues were found which required urgent attention in order to ensure compliance with the regulations. However, there were no record of these issues being actioned to ensure safety of the installations - no inspection outcomes had not been monitored or promptly rectified. As such, these issues are understood to remain unresolved at the time of audit (**see recommendation 8**).

The Council's policy is to carry out fire risk assessments on all council owned housing blocks on an annual basis. Internal audit selected a sample of housing blocks to establish whether annual fire risk assessment had been completed in line with this policy. Whilst, fire risk assessments had been completed in all cases, in 60% of cases the FRA was now overdue since it was last carried out more than a year ago. Moreover, in all cases reviewed following the FRA some high, medium or immediate priority recommendations were made, however there was no evidence of recommendations being addressed and necessary works being completed to ensure the safety of the residents. It is understood that these recommendations are to be picked up as part of a programme of fire safety improvements this year. A fire safety risk assessments strategy is also being prepared which will set out the Council's approach on how recommendations arising from FRAs are followed up and prioritised (**see recommendation 9**).

MBC is aware of inconsistencies and incomplete actions from the previous FRAs. To mitigate against this, consultants have been procured through a framework in line with National Fire Chiefs Council (NFCC) guidance. This includes the requirement to maintain 3rd party accreditation through the Fire Risk Assessors Certification (FRACS) scheme and a statement of competence with each fire risk assessment. The specification also requires timescales and justification

for the significant findings. Included within the commissioning of the FRAs there is provision for competent fire safety advice on the fire risk assessment and additional facility for fire safety advice outside of the scope of the assessments. Fire risk assessment reviews have also been allowed for.

It was also explained to Internal Audit that MBC is in regular contact with Leicestershire Fire and Rescue Services (LFRS) to mitigate the known risks around fire safety. LFRS are carrying out three spot checks on MBC owned housing blocks with communal areas every year. Last year MBC received informal action plan notices on three blocks and works were completed according to the agreed plan and timescales. This year, MBC has agreed an action plan with LFRS on a block of flats. Contractors are appointed through a framework to undertake the works due to be completed on site by the end of October.

The Legionnaires' disease Approved Code of Practice (ACOP) (L8) is aimed at duty holders including employers, those in control of premises and those with health and safety responsibilities for others, to help them comply with their legal duties in relation to legionella. The ACoP, L8, requires that 'a suitable and sufficient assessment is carried out to identify and assess the risk of exposure to Legionella bacteria from work activities and water systems on the premises and any necessary precautionary measures needed'. The risk assessment should be a living document which must be regularly reviewed to ensure it remains up to date. No legionella checks are required on single dwellings, however officers are considering starting to carry out legionella inspections on void properties. The review of a sample of housing stock properties revealed that, for the properties which are served by a communal hot water system, a legionella risk assessments were last completed in October 2017 and were last reviewed for annual compliance in March 2019.

The Council has a duty to manage asbestos as contained in regulation 4 of the Control of Asbestos Regulations 2012. Asbestos containing materials may be present if the building was constructed or refurbished before 2000. The Council's current policy on asbestos requires that asbestos assessments should be reviewed at least once every 12 months. Audit review revealed that currently no asbestos checks are being undertaken on any housing properties. If the Council has not complied with this for a period of time, they should consider a re-survey of all properties as the condition of the asbestos containing materials may have changed. Sample testing revealed that 80% of the properties reviewed had been surveyed for asbestos at some time. It was noted that recommendations were raised as a result of these surveys however there was no evidence of these being addressed nor evidence of annual any re-inspections (**see recommendation 10**).

In order to manage performance relating to health and safety inspections, it is good practice to develop key performance indicators that are monitored on a regular basis by management. Officers advised that performance is measured for gas and electricity servicing on annual basis and is part of the service level indicators. However, no performance was reported against this indicator for 2018/19. As such, there is no evidence to show that performance relating to landlord health and safety is monitored on a corporate level, e.g. % of properties overdue of inspections, no. of gas safety checks carried out per month, no. of electrical inspections carried out per month, time taken to respond to certificates rated as 'unsatisfactory', etc. Without set KPIs management may be unaware of poor performance and therefore action may not be taken to address any issues or areas of concern (**see recommendation 11**).

The risk of the Council's housing stock not being compliant to the property health and safety standards is included in the strategic risk register to ensure this is managed and monitored at the corporate level. The risk action owner is

the Director for Growth and Regeneration. The strategic risk register is owned by the Senior Leadership Team (SLT) and is reviewed and discussed every six months at the regular SLT meetings.

Based on the above findings, the overall assurance rating for the design of controls and compliance with controls is **Limited Assurance**.

3. LIMITATIONS TO THE SCOPE OF THE AUDIT

This is an assurance piece of work and an opinion is provided on the effectiveness of arrangements for managing only the risks specified in the Audit Planning Record.



The Auditor's work does not provide any guarantee against material errors, loss or fraud. It does not provide absolute assurance that material error; loss or fraud does not exist.

4. ACTION PLAN

The following action plan provides recommendations to address the findings identified by the audit. If accepted and implemented, these should positively improve the control environment and aid the Council in effectively managing its risks.

ACTION PLAN

Rec No.	ISSUE	RECOMMENDATION	Management Comments	Priority	Officer Responsible	Due date
1	<p>There are no policies on the electrical safety management or the gas safety of the Council's properties.</p> <p>There is a Legionella Management Policy available which is dated December 2018. Asbestos Policy prepared in 2014 is also available and is currently under review. However, both would benefit from a review to ensure it reflects current processes in place.</p> <p>Existing policies do not currently set out how inspection outcomes are monitored and addressed.</p>	<p>The electrical safety management policy as well as the gas safety policy should be designed to set out the Council's approach in regards to the electrical safety of its properties.</p> <p>Policies and procedures in place regarding landlord health and safety responsibilities should be reviewed and updated in line with the recommendations made in this audit, especially in relation to the recording and compliance monitoring of inspection outcomes. The policies should also specify the inspection frequency in line with the statutory requirements, where applicable.</p> <p><i>(to be linked with the 'Fixed Asset Policies' recommendation)</i></p>	<p>Agreed.</p> <p>Detailed response in the attached appendix.</p>	<p>Low</p> <p style="text-align: center;">●</p>	<p>Health and Safety Officer</p>	<p>June 2020</p>
2	<p>A central record of training is not in place making it difficult to identify training needs of the housing and assets team.</p> <p>In order to ensure that health and safety checks are carried out appropriately, officers must be suitably qualified and continue to receive the</p>	<p>To ensure that members of staff are suitably qualified, evidence of employee competence should be obtained at the recruitment stage.</p> <p>The Council should then maintain an active register of training relating to all in house staff that are involved in carrying out landlord's health and safety checks on all</p>	<p>Agreed.</p> <p>Detailed response in the attached appendix.</p>	<p>Medium</p> <p style="text-align: center;">●</p>	<p>Director of Growth and Regeneration</p>	<p>March 2020</p>

Rec No.	ISSUE	RECOMMENDATION	Management Comments	Priority	Officer Responsible	Due date
	appropriate training.	Council properties including housing stock. The register should be regularly updated and monitored to ensure all staff receive appropriate training.				
3	Audit review on the sample of the Council's housing properties demonstrated that evidence of contractor competence was not available for a sample of contractors that undertook annual fire risk assessments, asbestos and legionella checks. Not being able to demonstrate the contractor competence to carry out health and safety inspections increases a risk of reputational damage to the Council and may also lead to harm to the Council's tenants.	Ensure that evidence to demonstrate contractor competence is obtained prior to contractors undertaking any inspections/work on the Council's properties.	Agreed. Detailed response in the attached appendix.	Medium 	Director of Growth and Regeneration	April 2020
4	No guidance and advice on water safety could be found in the tenant's handbook or the tenancy agreement. Tenants should be informed on matters such as not to adjust the temperature setting of the calorifier, to regularly	Tenant's handbook should include guidance and advice on water safety as recommended by the Health and Safety Executive.	Agreed. Detailed response in the attached appendix.	Low 	Housing, Welfare and Safer Communities Manager	April 2020

Rec No.	ISSUE	RECOMMENDATION	Management Comments	Priority	Officer Responsible	Due date
	clean showerheads and notify the landlord if the hot water is not heating properly or there are any other problems with the system so that appropriate action can be taken.					
5	<p>There is no central record of all health and safety inspections carried out by property.</p> <p>Inspection records are currently recorded in a variety of ways. Evidence of checks such as electrical inspection certificates are held in the relevant network folders. Annual gas checks and fire risk assessments are recorded on the spreadsheet. No checks on asbestos are being carried out at this time, but some records on some previous surveys are held in the relevant network folders.</p> <p>This lack of consistency and oversight increases a risk of the Council's housing stock not being inspected in a timely matter and poses a challenge in tracking the progress of the inspections.</p>	<p>All inspection records should be held centrally to ensure checks are undertaken in a timely manner and that the Council meets its statutory responsibilities as a landlord.</p> <p>The use of the housing management system should be explored to ascertain if it could be used in centralizing all records and conducting effective monitoring.</p>	<p>Agreed.</p> <p>Detailed response in the attached appendix.</p>	<p>High</p> <p>●</p>	Housing and Commercial Asset Manager	April 2020
6	Audit testing reviewed a sample of	Ensure that annual gas safety checks are	Agreed.	High	Senior Surveyor	April 2020

Rec No.	ISSUE	RECOMMENDATION	Management Comments	Priority	Officer Responsible	Due date
	single dwellings and housing blocks to establish if annual gas checks are carried out. No gas checks are required for communal blocks, except if communal heating is in place, and in one such instance a gas safety check was found to have been overdue at the time of the audit. The officers have now confirmed and provided evidence of the completed gas safety check.	undertaken in a timely manner. Once a central register is established, any gaps in completion of annual gas inspections should be undertaken at the earliest opportunity.	Detailed response in the attached appendix.	●	and Facilities Officer	
7	As above, sample testing identified a housing block which had not been subject to a gas safety inspection in the last twelve months. This had arisen following the completion of a project where handover arrangements had failed to account for the safety inspection and this had not been highlighted for action. This inspection was promptly completed once flagged to officers by Internal Audit but highlights the risk of failing to account for inspections in construction/refurbishment project handovers.	Lessons should be learnt from this incident in improving inclusion of such checks in project handover arrangements and reviewing CDM provision.	Agreed Detailed response in the attached appendix	Low ●	Housing and Commercial Asset Manager	April 2020
8	There is currently no Council policy on	All outstanding electrical inspections must	Agreed.	High	Housing and	April 2020

Rec No.	ISSUE	RECOMMENDATION	Management Comments	Priority	Officer Responsible	Due date
	<p>electrical safety however the relevant UK standard for electrical safety advises on five yearly inspections. Audit testing reviewed a sample of single dwellings and housing blocks to establish if five yearly electrical inspections are carried out. In sample testing, 45% of housing stock selected had been subject to an electrical inspection in the last five years, a further 7% had received the inspection but more than five years ago – for the remaining 48% there was no record of any electrical inspections.</p> <p>In all cases the issues needing addressing were raised as a result of inspections, however there was no evidence of any rectifying actions, moreover in 17% of cases electrical inspection certificates showed that ‘overall assessment of the installation’ in terms for its suitability for continued use was ‘unsatisfactory’ meaning issues noted needed to be addressed as a matter of urgency. No record of issues being actioned was available.</p>	<p>be completed and an inspection frequency formally established.</p> <p>Establish a process for recording and monitoring inspection outcomes and ensure these are promptly actioned and evidence of such audit trail is maintained.</p>	Detailed response in the attached appendix.	●	Commercial Asset Manager	
9	Audit selected a sample of housing blocks to establish if annual fire risk	All outstanding fire safety risk assessments must be completed and subject to annual	Agreed.	High ●	Housing and Commercial Asset	December 2019

Rec No.	ISSUE	RECOMMENDATION	Management Comments	Priority	Officer Responsible	Due date
	<p>assessment are being completed. The fire risk assessments were completed in all cases, however for 60% the FRA was now overdue since it was last carried out more than a year ago.</p> <p>In all cases reviewed following the FRA some high, medium or immediate priority actions required were noted, however there was no evidence of actions arising being completed following the FRA. It is understood that these are to be picked up as part of a programme of fire safety improvements this year.</p>	<p>review.</p> <p>Establish a process for recording and monitoring assessment outcomes and ensure these are promptly actioned and evidence of such audit trail is maintained.</p>	<p>Detailed response in the attached appendix.</p>		<p>Manager</p>	
10	<p>No central record of asbestos checks is maintained and currently no asbestos checks are being undertaken on the housing properties.</p> <p>Audit sample testing revealed that 80% of the properties had been subject to an asbestos survey as some time. However, where recommendations were raised as a result of the surveys there was no evidence of these actions being addressed or re-inspections carried out. There is no system in place</p>	<p>All properties must be surveyed in accordance with the Council policy. Those properties without surveys should be inspected as soon as possible.</p> <p>Establish a process for recording and monitoring recommendations resulting from asbestos surveys to ensure these are promptly actioned and evidence of such audit trail is maintained.</p>	<p>Agreed.</p> <p>Detailed response in the attached appendix.</p>	<p>High</p> <p>●</p>	<p>Housing and Commercial Asset Manager</p>	<p>December 2019</p>

Rec No.	ISSUE	RECOMMENDATION	Management Comments	Priority	Officer Responsible	Due date
	that could effectively address and monitor any recommendations made as a result of the surveys or to re-assess properties.					
11	<p>In order to manage performance relating to health and safety inspections, it is good practice to develop key performance indicators that are monitored on a regular basis by management.</p> <p>Internal audit could not be provided with any evidence of such performance monitoring. There is a risk, therefore, that management may not be aware of any failure to comply with the policies.</p>	KPIs relating to health and safety inspections should be introduced and subject to regular monitoring to provide assurance that all health and safety responsibilities are being fulfilled in accordance with legislation and policy.	<p>Agreed.</p> <p>Detailed response in the attached appendix.</p>	<p>Medium</p> <p>●</p>	Housing and Commercial Asset Manager	April 2020

GLOSSARY

The Auditor's Opinion

The Auditor's Opinion for the assignment is based on the fieldwork carried out to evaluate the design of the controls upon which management rely and to establish the extent to which controls are being complied with. The tables below explain what the opinions mean.

Compliance Assurances		
Level	Control environment assurance	Compliance assurance
Substantial ●	There are minimal control weaknesses that present very low risk to the control environment.	The control environment has substantially operated as intended although some minor errors have been detected.
Good ●	There are minor control weaknesses that present low risk to the control environment.	The control environment has largely operated as intended although some errors have been detected.
Satisfactory ●	There are some control weaknesses that present a medium risk to the control environment.	The control environment has mainly operated as intended although errors have been detected.
Limited ●	There are significant control weaknesses that present a high risk to the control environment.	The control environment has not operated as intended. Significant errors have been detected.
No ●	There are fundamental control weaknesses that present an unacceptable level of risk to the control environment.	The control environment has fundamentally broken down and is open to significant error or abuse.

Organisational Impact		
Level	Definition	
Major ●	The weaknesses identified during the review have left the Council open to significant risk. If the risk materialises it would have a major impact upon the organisation as a whole.	
Moderate ●	The weaknesses identified during the review have left the Council open to medium risk. If the risk materialises it would have a moderate impact upon the organisation as a whole.	
Minor ●	The weaknesses identified during the review have left the Council open to low risk. This could have a minor impact on the organisation as a whole.	

Category of Recommendations

The Auditor prioritises recommendations to give management an indication of their importance and how urgent it is that they be implemented. By implementing recommendations made managers can mitigate risks to the achievement of service objectives for the area(s) covered by the assignment.

Priority	Impact & Timescale	
High ●	Action is imperative to ensure that the objectives for the area under review are met.	
Medium ●	Requires actions to avoid exposure to significant risks in achieving objectives for the area.	
Low ●	Action recommended to enhance control or improve operational efficiency.	