

Appendix

Internal Audit Report – Housing Tenancy Verification July 2010

Summary of Recommendations and Action

	Recommendation	Action Agreed	Completion target	Progress
1	Information recorded on the Tenancy Check record spreadsheets to be consistent across the five area housing offices	Standard recording spreadsheet format to be adopted	30/06/2010	Achieved
2	Properties visited prior to January 2009 should be revisited prior to the beginning of 2011 to ensure the target of visiting each property within a two-year cycle is achieved	We will attempt to do this	31/12/2010	This is unlikely to be achieved. The number of tenancies where we have been unable to gain access is relatively high, and these need to be prioritised before revisiting tenancies last checked in 2009. A cycle of tenancy visits every 3 years is more realistic.

3	Management to review the current processes for undertaking tenancy check visits including when they are undertaken to ensure that the chances of identifying illegal subletting/occupancy are maximised	Procedure to be reviewed. Tenancy checks where indicators suggest fraud to be made on an unnotified basis	30/09/2010	Achieved
4	Tenancy files to contain details of all tenancy visits	All tenancy visit documentation to be placed on the file	30/06/2010	Achieved
5	Management to review the list of documents that can be accepted as evidence of identity	Agreed	31/08/2010	Achieved
6	Out of date documentation not to be accepted as evidence of identity	Agreed	30/06/2010	Achieved
7	Management to review how identity documents are examined and whether it is feasible to take a copy of such documents shown during tenancy visits and place them on the tenancy file subject to compliance with the Data Protection Act	Agreed	31/08/2010	Review completed. Mobile copying technology is not available to officers undertaking tenancy checks.
8	Management to ascertain whether it is feasible to record tenancy checks on the OHMS system in future instead of completing individual spreadsheets at each area office	Agreed	31/10/2010	This would be possible with system enhancements. However there are greater priorities for the OHMS team, and this may not be implemented until March 2011

9	All cases of suspected unauthorised occupancy to be reported to Head of Audit and Business Risk or the Principal Auditor (lead for counter fraud) to enable the matter to be logged and the intelligence disseminated and investigated by the appropriate personnel within the council following a risk assessment of the evidence available	Agreed	30/06/2010	Achieved
10	Risk Assessments undertaken prior to tenancy management visits to be documented	Agreed – tenancy visit checklist to be reviewed	30/06/2010	Achieved
11	Three ‘cold call’ visits should be made to a housing property where there is a suspicion of unauthorised occupancy before a card is left	Agreed, although this will have a negative impact upon officer ability to meet the challenging two year visit cycle	31/08/2010	Achieved
12	Details to be maintained as to how many properties have been recovered as a result of proven unauthorised occupancy	Agreed. Housing Managers collect this information and report quarterly	30/06/2010	Achieved
13	Claims for damages should be considered where it is found that a tenant occupying a property unlawfully has substantial assets	Agreed. Legal Services consider this as part of case management	30/06/2010	Achieved
14	Tenancy files to be reviewed prior to a tenancy check being undertaken to	Agreed	30/06/2010	Achieved

	ensure that there is a tenancy agreement on file. Housing Officer to investigate each case where one cannot be located, ensure the tenancy is legal and complete a tenancy agreement as appropriate			
15	Photographs to be taken of all tenants if there is sufficient funding available to set up and maintain a system	Agreed to undertake a feasibility study	30/09/2010	Report to HMCC November 2010 and Housing CMM December 2010
16	Access controls to be implemented if a decision is made to go ahead with and introduce a system whereby photographs of tenants are held on a centralised system.	Pending decision	Pending decision	Pending decision

HC BIMTM September 2010.