



Dacorum Borough Council

Summary Internal Controls Assurance (SICA) Report

January 2025

Final

Summary Internal Controls Assurance

Introduction

1. This summary controls assurance report provides the Audit Committee with an update on the emerging Governance, Risk and Internal Control related issues and the progress of our work at Dacorum Borough Council between 27th November 2024 and 31st January 2025.

Investing in the Future of TIAA

2. TIAA welcomed our largest intake of talented and enthusiastic trainees in the summer across the UK. This initiative is a testament to our dedication to nurturing the next generation of professionals and ensuring that we continue to deliver the highest standards of service to you. This builds on past successes where staff who joined TIAA as trainees have obtained professional qualifications and progressed to audit management roles.

We believe that investing in their development is crucial not only for their personal growth but also for the continued success of TIAA. To this end, we are sponsoring their professional qualifications, providing them with the necessary resources and support to excel in the internal audit profession and any relevant specialism they may choose.

With each trainee mentored by an experienced Director of Audit, we have re-designed a comprehensive training programme that covers a wide range of skills and knowledge areas. All trainees have been guided by experienced audit staff and management, shadowing on audits to get to know our client base, following a high standard already set by our experienced team.

By investing in our trainees, we are investing in the future of our company. We are confident that this initiative will enhance our capabilities. Our commitment to the quality of our services remains unwavering, and we are excited about the positive impact our new trainees will have on our work with you.

Audits completed since the last SICA report to the Audit Committee

3. The table below sets out details of audits finalised since the previous meeting of the Audit Committee:

Review	Evaluation	Key Dates			Number of Recommendations			
		Draft issued	Responses Received	Final issued	1	2	3	OEM
Private Sector Housing	Reasonable	4 th December 2024	6 th January 2025	29 th January 2025	0	2	3	1

4. The Executive Summaries for each of the finalised reviews are included at Appendix A. There are no issues arising from these findings which would require the annual Head of Audit Opinion to be qualified.

Progress against the 2024/2025 Annual Plan

5. Our progress against the Annual Plan for 2024/25 is set out in Appendix B.
6. Follow Up will be reported with a detailed follow up schedule going to the March 2025 Audit Committee to allow for final resolution of any concerning recommendations ahead of the year end.

Changes to the Annual Plan 2024/25

7. There have been no changes to the audit plan.

Progress in actioning priority 1 & 2 recommendations

8. We have made no Priority 1 recommendations (i.e. fundamental control issue on which action should be taken immediately) since the previous SICA.

Frauds/Irregularities

9. We have not been advised of any frauds or irregularities in the period since the last SICA report was issued.

Other Matters

10. We have issued a number of briefing notes and fraud digests, shown in Appendix C, since the previous SICA report.

Responsibility/Disclaimer

11. This report has been prepared solely for management's use and must not be recited or referred to in whole or in part to third parties without our prior written consent. The matters raised in this report not necessarily a comprehensive statement of all the weaknesses that exist or all the improvements that might be made. No responsibility to any third party is accepted as the report has not been prepared, and is not intended, for any other purpose. TIAA neither owes nor accepts any duty of care to any other party who may receive this report and specifically disclaims any liability for loss, damage or expense of whatsoever nature, which is caused by their reliance on our report.


Appendix A: Executive Summaries

The following Executive Summaries are included in this Appendix. Full copies of the reports are provided to the Audit Committee.

Review	Key Findings
Assurance Review of Private Sector Housing	<p>KEY STRATEGIC FINDINGS:</p> <ul style="list-style-type: none"> • A review of a sample of ten properties identified delays in processing complaints for three cases and one case where follow-up action was not scheduled through the system. • A review of a sample of five enforcement notices identified two instances where key supporting documentation was stored on personal rather than shared drives or system locations. • There are up-to-date policies; Enforcement Policy, the Civil Penalty Policy and the Houses in Multiple Occupation (HMO) Licensing Policy, and a number of procedures and process maps supporting the Private Sector Housing (PSH) team. • Private Sector Housing (PSH) key performance indicators (KPIs) are reported to the Overview and Scrutiny Committee (OSC) and at Senior Leadership Team (SLT) performance review meetings. • Although the effectiveness of controls in relation to Governance Framework has been noted as “Partially in Place”, this is not because regulatory requirements have not been adhered to, but due to recommendations being made that relate to the overall Governance Framework. <p>GOOD PRACTICE IDENTIFIED:</p> <ul style="list-style-type: none"> • A Housing Health and Safety Rating System (HHSRS) assessment is used at formal inspections to establish risk and categories of hazards. • Training needs are identified using the PHS training matrix and new officer training plan. HHSRS certification was confirmed for a sample of three officers.

Report 1 - Assurance Review of Private Sector Housing

Executive Summary

<p>OVERALL ASSESSMENT</p>	
<p>ASSURANCE OVER KEY STRATEGIC RISK / OBJECTIVE</p>	<p>Failure to ensure compliance with statutory and legislative requirements. Inability to manage and deliver safe and good quality affordable homes.</p>
<p>SCOPE</p>	<p>To provide assurance the Council is meeting its responsibilities in this area. To include compliance with regulatory requirements in relation to Housing Act 2004 and in particular complaints received vs inspection HMO licencing application process, Housing Health and Safety Rating System (HHSRS) inspection processes, leading into identification of Cat 1 hazards and enforcement action of private sector housing.</p>

<p>KEY STRATEGIC FINDINGS</p>	<p>A review of a sample of ten properties identified delays in processing complaints for three cases and one case where follow-up action was not scheduled through the system.</p> <p>A review of a sample of five enforcement notices identified two instances where key supporting documentation was stored on personal rather than shared drives or system locations.</p> <p>There are up-to-date policies; Enforcement Policy, the Civil Penalty Policy and the Houses in Multiple Occupation (HMO) Licensing Policy, and a number of procedures and process maps supporting the Private Sector Housing (PSH) team.</p> <p>Private Sector Housing (PSH) key performance indicators (KPIs) are reported to the Overview and Scrutiny Committee (OSC) and at Senior Leadership Team (SLT) performance review meetings.</p> <p>Although the effectiveness of controls in relation to Governance Framework has been noted as "Partially in Place", this is not because regulatory requirements have not been adhered to, but due to recommendations being made that relate to the overall Governance Framework.</p>								
<p>GOOD PRACTICE IDENTIFIED</p>	<p>A Housing Health and Safety Rating System (HHSRS) assessment is used at formal inspections to establish risk and categories of hazards.</p> <p>Training needs are identified using the PHS training matrix and new officer training plan. HHSRS certification was confirmed for a sample of three officers.</p>								
<p>ACTION POINTS</p>	<table border="1"> <thead> <tr> <th>Urgent</th> <th>Important</th> <th>Routine</th> <th>Operational</th> </tr> </thead> <tbody> <tr> <td>0</td> <td>2</td> <td>3</td> <td>1</td> </tr> </tbody> </table>	Urgent	Important	Routine	Operational	0	2	3	1
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Assurance - Key Findings and Management Action Plan (MAP)

Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
1	Directed	<p>A sample of ten properties (four HMOs and six single family dwellings) was selected from a download of all properties where a complaint had been logged between October 2023 and September 2024.</p> <p>Testing identified the following:</p> <ul style="list-style-type: none"> In two cases, there was a delay in processing. One instance where the enforcement officer's sickness followed by maternity leave meant that the case was not closed on the system until 8 months after the final action was taken. It was noted that the case was resolved before the period of absence, but the system was not updated in a timely manner because it was not re-allocated in the meantime. The second instance was where, six weeks after the last action on the case, an enforcement officer had not discussed the case with the manager for advice on the next steps. One case was closed, and a follow-up check should have been scheduled to check the status of an HMO, but the check was not entered on the system. <p>It is noted that a live cases tracker is available to ensure cases are processed promptly and a schedule of actions is used to ensure tasks are completed on a timely basis.</p>	<p>It be ensured that controls over re-allocation of cases are robust and consistently applied.</p> <p>Officers be reminded to schedule tasks on the system, in particular, any follow-up action once a case is closed.</p>	2	<p>This has now been actioned.</p> <p>Management run live case reports on the system across all civica sections to ensure accurate reports on live/open cases at officer 121's case reviews, officer long term sick periods or leaving the organisation – this will ensure that no cases are missed.</p> <p>Issue has been raised with the team (lead officers/officers). Officers are now required to ensure there is always a future scheduled action to record next action required on civica. This will ensure that no cases or actions are missed during staff absence. This will remain under review by management at 121s and case reviews to ensure it is adopted/completed.</p>	17/10/2024	Manager + Lead Officers + Officers

Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
2	Directed	<p>A sample of five enforcement notices was selected to confirm whether they had been agreed at the appropriate level. Only one was traced to the Enforcement Panel Form (EPF) which was signed-off by the Private Sector Housing Manager as required.</p> <p>Two EPFs could not be located, and these highlighted a practice used by some team members of routinely retaining documentation on personal rather than shared drives or system locations. The Private Sector Housing Manager advised that the system is being developed to ensure that tasks are carried out and records are retained through a live action diary function on the system.</p> <p>Two notices related to the same case and had not yet been served. These highlighted a new officer's training and support needs which are known and being addressed.</p>	<p>Clear instructions be given to the Private Sector Housing team to ensure all documentation is readily available to view at any time in a location accessible by any member of the team or other internal DBCC teams as required.</p>	2	<p>Actioned.</p> <p>Since April 2024 the digital team have been working to reconfigure civica to fit the needs and recent changes within the team's enforcement processes/policy. This includes the addition of required documentation to ensure record keeping standards/uniformity.</p> <p>Until system is set up, officers to ensure all documents are indexed to cases.</p>	April 2024	Manager + Lead Officers + Officers
3	Directed	<p>Over half of the fourteen procedure maps reviewed on 25th September 2024 was overdue for review or the review was due in September 2024 and had not been carried out.</p> <p>In addition, a review of a sample of the procedures identified that they included very few timescales or target number of days for the different stages of the processes.</p>	<p>Reviews be carried out when due and dates be accurately reflected on the policies and procedure maps.</p> <p>Procedure maps be updated to include timescales for stages of the process, where applicable and relevant.</p>	3	<p>The procedure maps are updated as and when changes to processes are made/required and therefore none were incorrect. As a result of staff shortages in the PSH Team over the course of 2024, the full procedure map review was considered a lower priority as statutory duties take precedent. The procedure map review has begun as of December 2024.</p>	December 2024	Lead Officers

Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
4	Directed	<p>There is currently limited proactive action taken to review housing conditions. The system in place is reactive and conditions are reviewed following a complaint or referral from the public, a partner agency or another internal council team.</p> <p>A review of the HMO Register published on the website as of 16th September 2024 recorded 136 licenced HMOs. The Housing Stock review in 2020 estimated 234 HMOs required a mandatory licence and the 2023/24 Local Authority Housing Statistics (LAHS) report indicated similar figures. This would indicate that the Council has an issue with unlicensed HMOs.</p>	<p>Proactive work be further developed to assess housing conditions for both single-family dwellings and HMOs.</p>	3	<p>The LAHS report utilises figures as per the housing stock condition survey.</p> <p>Proactive working carried out has included:</p> <p>Marlowes day of action – proactive, multiagency door knocking exercise targeting 1 – 33 Marlowes (June 2024).</p> <p>Op Riparius – multi agency working with Police/Modern Slavery to support with identifying HMO's and/or substandard housing conditions (October 2024).</p> <p>Intelligence gathering to proactively identify unlicensed HMO's including annual review of electoral register and tenancy deposits.</p> <p>Lead Officers in the PSH Team are due to prep further days of action for early 2025 with a view to quarterly multi team/agency operations. This was due in 2024 but due to resource issues reactive work had to be prioritised.</p>	January 2025	Lead Officers + management oversight.

Rec.	Risk Area	Finding	Recommendation	Priority	Management Comments	Implementation Timetable (dd/mm/yy)	Responsible Officer (Job Title)
5	Delivery	<p>There is limited regular operational reporting providing assurance over the management of PSH responsibilities. There is no report covering timeliness (with respect to any delays in processing cases, requesting information etc.) or compliance with processes (such as inspections carried out, documentation supporting decisions (HHSRS) etc.). Reports are not used within PSH management to ensure that the officers are operating consistently, following the agreed procedures and process maps, and that there are sufficient resources for the level of activity.</p> <p>It is noted that case processing times will vary and are influenced by risk and factors outside the PSH team's control such as availability and engagement of tenants / landlords.</p> <p>The Head of Safe Communities stated that timeliness and consistency are managed on a day-to-day basis, in case reviews and in 1-2-1 meetings.</p>	<p>Regular reporting of compliance and activity be identified and developed to support decision-making in areas such as case prioritisation, resource requirements and where improvements in controls are necessary.</p>	3	<p>There is regular management oversight of the operations of the PSH Team. Assurance is managed through 121s, case reviews, KPI's, day to day support. Any concerns would be escalated and presented to senior leadership as and when required.</p>	January 2025	Manager

Appendix B: Progress Against Annual Plan 2024/25

System	Planned Quarter 24/25	Current Status	Comments
Financial Resilience	1	Draft	Draft 4 th October 2024
Key Financial Controls	1		Final 12 th September 2024
Community Engagement	1		Final 22 nd October 2024
Business Continuity	1		Final 17 th September 2024
Housing Regulatory Compliance and Building Safety	1		Reported to September AC
Fleet Management Strategy	2		Final 11 th September 2024
Private Sector Housing	2	Final	Draft 7 th November, management requested longer time to review the report due to Annual Leave (returned from leave on 18 th November). Revised Final 29 th January 2025
Capital Programme	2		Final 12 th November 2024
Income – Cash and Bank	3	Exit Meeting 30 th January 2025	
Tenancy Management and Enforcement	3	Preliminary meeting 28 th January 2025	
Leaseholders- review of Section 20 process (Cancelled – became Supported Housing and Tenancy Sustainment)	3	Preliminary meeting 8 th January 2025	
MTFS	3	In progress	

System	Planned Quarter 24/25	Current Status	Comments
Risk Management Framework	3	In progress	
Recruitment and Training	4	Draft is in review process. Will be issued imminently.	
Project Management	4	Preliminary meeting 15/1/2025	
Licensing	4	Opening meeting Mark Brooks. 18 th February 2025	

KEY:

To be commenced	Site work commenced	Draft report issued	Final report issued
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Appendix C: Briefings on Developments in Governance, Risk and Control

TIAA produce regular briefing notes to summarise new developments in Governance, Risk, Control, Counter Fraud and Security Management which may have an impact on our clients. These are shared with clients and made available through our Online Client Portal. A summary list of those briefings issued in the last three months which may be of relevance to Dacorum Borough Council is given below:

Summary of recent Client Briefings and Alerts

Date Issued	Sector	Briefing Type	Subject	Website Link	TIAA Comments
20 DECEMBER 2024	ALL	Security Alert	Company Sanctioned for Deploying Staff with Fraudulent SIA Licences	Company Sanctioned for Deploying Staff with Fraudulent SIA Licences - TIAA	A security company has been sanctioned for deploying 26 untrained staff with fraudulent SIA licences across the capital on 832 separate shifts. Our alert has the full story and advice.
12 DECEMBER 2024	ALL	Security Alert	Increase in People Sheltering in Waste Containers	Increase in People Sheltering in Waste Containers - TIAA	With the rise in homelessness, the waste management industry is encountering an increasing number of rough sleepers seeking shelter in waste containers, which poses significant risks when waste is collected.
12 DECEMBER 2024	Healthcare	Anti-Crime Alert	Covid Corruption Commissioner Appointed	Covid Corruption Commissioner Appointed - TIAA	This briefing covers the appointment of Tom Hayhoe as the new Covid Corruption Commissioner to investigate PPE fraud. His first task is to review the £8.7bn worth of PPE purchased during the pandemic that was written off. Our alert has all the details.
10 DECEMBER 2024	Charities	Briefing	Charity Commission Refreshes Anti-Fraud Guidance	Charity Commission Refreshes Anti-Fraud Guidance - TIAA	The Charity Commission recently published updated guidance to help trustees protect their charities from fraud and cybercrime.
6 DECEMBER 2024	ALL	Publication	Security Industry Authority (SIA) Annual Report 2024 Summary	Security Industry Authority (SIA) Annual Report 2024 Summary - TIAA	TIAA's summary of the Security Industry Authority (SIA) Annual Report 2024. Dive into the figures, key points and developments that are shaping the security industry.
29 NOVEMBER 2024	Healthcare	Security Alert	140 arson attacks on GP Practices and Hospitals	140 arson attacks on GP Practices and Hospitals - TIAA	GP practices and hospitals have been advised to protect their premises as official data reveals over 140 arson attacks took place at healthcare buildings last year. Home Office figures showed that there were 500 fires at hospitals and medical care facilities in 2023/24 in England, of which 146 were deliberate.
27 NOVEMBER 2024	ALL	Briefing	The Economic Crime and Corporate Transparency Act Update	The Economic Crime and Corporate Transparency Act Update - TIAA	An update on The Economic Crime and Corporate Transparency, On 16 October 2024, gov.uk published their latest policy paper on the Economic Crime and Corporate Transparency Act, outlining the transition plan for Companies House.
22 NOVEMBER 2024	Healthcare	Security Alert	Bogus Security Guard	Bogus Security Guard - TIAA	A man has been jailed for nearly three years for using a fake SIA licence to work at an NHS Trust and steal £1425. The individual, who never held an SIA licence, deceived his employer and was sentenced to 33 months' imprisonment. Our alert has the full details.
12 NOVEMBER 2024	ALL	TIAA Article	Are you Scam Savvy?	Are you Scam Savvy? - TIAA	In today's digital age, scams are becoming increasingly sophisticated and prevalent. To help you stay informed and protected, we've compiled a series of articles that delve into some of the most common types of fraud.