

FROM: Audit and Risk Manager
TO: Head of Housing Services
C.C. Chief Executive
Deputy Chief Executive (BH)
Head of Finance
Landlord Services Manager
Landlord Operations Manager
Portfolio Holder (Cllr Matecki)

SUBJECT: Tenancy Management
DATE: 31 March 2021

1 Introduction

- 1.1 In accordance with the Audit Plan for 2020/21, an examination of the above subject area has recently been completed by Jemma Butler, Internal Auditor, and this report presents the findings and conclusions for information and action where appropriate.
- 1.2 Wherever possible, findings have been discussed with the staff involved in the procedures examined and their views are incorporated, where appropriate, into the report. My thanks are extended to all concerned for the help and cooperation received during the audit.
- 1.3 The audit was undertaken during the COVID-19 pandemic. This has meant a slightly different approach has been taken to complete the audit. Rather than observing staff members and meeting staff face-to-face, correspondence has been via email, telephone calls or virtually through MSTeams.

2 Background

- 2.1 Housing officers manage the active tenancies using Active H. Various housing staff have access, allowing tenants details to be added and updated, documents to be saved and diary notes added ensuring that housing tenancies can be effectively managed.
- 2.2 The Council owns 5,391 houses and flats which generate an annual rental income in the region of £24.8m. As well as these rental properties, the Council also manages twelve shared ownership properties, 616 Leaseholders and 40 non secure / temporary accommodation places.
- 2.3 Tenancy management covers the roles and duties involved from when a tenancy starts until it ends, ensuring tenants receive high quality customer service and the Council has well-managed properties and is compliant with relevant legislation.

3 **Scope and Objectives of the Audit**

3.1 The audit was undertaken to test the management controls in place.

3.2 In terms of scope, the audit covered the following areas:

- Staff roles and responsibilities.
- Lone working and safeguarding.
- Tenancy visits.
- Tenancy Management.
- Mutual exchanges.
- Garage management.
- Complaints and ASB.

3.3 The audit programme identified the expected controls. The control objectives examined were:

- Staff know who to report to and there are clear lines of responsibility.
- Staff are aware of their role and responsibilities.
- Staff have the required access and permissions to carry out their roles.
- The phone lines have appropriate cover.
- The Council is compliant with relevant legislation.
- Appropriate checks have been carried out on the housing staff.
- Staff are aware of safeguarding procedures and are alert to the potential signs when carrying out visits.
- Staff are not putting themselves at un-necessary risk when carrying out visits.
- Staff are aware of the risks and follow the Councils guidance to help keep themselves and members of the public safe.
- Staff are aware of the expectation to visit tenants.
- Staff document visits and make relevant notes which are followed up when needed.
- Staff complete tenancy update visits.
- Scheduled safety checks and works are completed in a timely manner.
- Staff provide advice and support tenants regarding succession cases.
- Tenants are aware of the conditions of the tenancy and their obligations.
- Tenants sign their agreement and are provided with relevant documentation.
- Secure tenants are aware of any changes to their tenancy.
- Staff respond to information provided by the public regarding the occupation of Council properties.
- Staff are aware of the requirements in place to validate mutual exchanges and the expectations of their role in the process.
- Tenancy details are up-to date after mutual exchanges have been completed.
- Garages are used for the correct purpose and maintained appropriately.
- Complaints (including anti-social behaviour) are managed appropriately.

4 Findings

4.1 Recommendations from Previous Report

4.1.1 The audit of Tenancy Management is new to 2020-21 so there are no previous recommendations to follow up on.

4.2 Staff roles and responsibilities

4.2.1 A restructure of housing services was completed in early 2020 after being agreed at Employment Committee on December 10th 2019. This restructure resulted in a clear staffing structure with a number of new posts available within the service.

4.2.2 There is no written procedure manual in place for new starters to follow. This will have impacted the introduction and training for new starters as normal face-to-face training has been difficult to complete due to the Covid restrictions in place since March 2020. The Landlord Operations Manager, new to the role in January 2021, is aware of the lack of documented procedures and is working on compiling a complete manual. This will ensure new starters have a guide to follow and that existing staff are able to follow the same processes.

4.2.3 The job descriptions in place were refreshed as part of the restructure. They clearly define the roles and duties expected, separating out some of the speciality tasks to specific roles, such as garage management. All of the job descriptions emphasise the importance of giving excellent customer service and well-managed lettings.

4.2.4 The housing management system (ActiveH) is used by all Housing staff, enabling them to manage fully all aspects of the letting and the tenant's details. This includes logging the details of any contact with the tenant, visits completed, storage of relevant documents, reviews of the rent status and log repairs or complaints. Access is checked regularly (approx. every six months) by the business administration team to ensure the right staff have the access levels required.

4.2.5 Housing Officers' roles includes providing phone cover - staff members are allocated a time on a rota which they dedicate to phone duty and, between calls, admin tasks. The rota in place splits the day into two shifts - mornings (8:45 to 13:00 hrs) and afternoons (13:00 to 17:15 hrs). These shifts will usually be covered by two separate staff members with a third available as a backup. At the moment the backup is only used when the staff member on phone duty Jabbers¹ them asking them to log in to answer a call.

4.2.6 A call log report is currently shared with senior Housing staff showing the previous week's call data. This report shows the number of calls received and the number of calls abandoned. A selection of these reports was reviewed

¹Jabber is an internal call and messaging system.

and showed that between 8% and 13% of call were abandoned during January (business hours only).

- 4.2.7 The business administration team were able to provide to the auditor an additional report breaking the calls into hours and including additional data such as length of calls and time before calls are abandoned. A report was run for the Month of October 2020. October was chosen as the restrictions in place at that point were the most relaxed they had been since the pandemic began so it was felt that the data would have been the closest to a 'normal' month.
- 4.2.8 Analysis of the report showed that there was an average of 147 calls per week with a queuing time ranging from one minute to 58 minutes with the average wait being 22 minutes. The average number of calls abandoned across the month was 8%, although this varied across the shifts with some shifts having almost 30% of calls abandoned. The average number of calls per shift ranged from 12 to 27 with Monday and Wednesday morning receiving the most calls and Tuesday and Friday afternoons the least.
- 4.2.9 Analysis of both the monthly and weekly call reports show that the phone duty system in place is not working as efficiently as it could and perhaps requires a review of the procedure.

Risk

The Council's reputation may be affected adversely by calls not being answered or customers waiting online for an excessive amount of time.

Recommendation

A review should be completed of the phone duty rota and procedure to ensure busier shifts are covered and so calls abandoned are kept to a minimum. Call waiting messages could be played reminding customers of the other ways to make contact, encouraging a channel shift towards using the website or email.

- 4.2.10 There are a number of acts in place for the provision of housing services, the most relevant act used is the 1983 Housing Act, along with updates including the Housing and Homelessness Act 2020. All the officers interviewed for the audit were aware of the Acts and which parts of their roles were most affected by them.

4.3 Lone working and safeguarding

- 4.3.1 There is a safeguarding policy in place, updated July 2020, which states "in line with the Council's recruitment and selection policy, Disclosure and Barring Service (DBS), checks will be carried out on all staff involved in regulated activity relating to children and adults with needs for care and support." A review of the recruitment and selection policy covering guidance on DBS checks and regulated activity noted that there was no relevant

guidance available for the vetting of employees. It was also noted there was no vetting guidance available within the HR pages on the intranet.

- 4.3.2 DBS checks have not been carried out on Housing officers for a number of years. Government guidance, available at gov.uk, has a form available which guides the employer to the level of DBS check they can request the employee to complete.

Advisory

Review whether some of the housing roles require a DBS check using guidance on the gov.uk website and advice from HR.

A review has been completed since the first draft of this report was issued. It has been confirmed that the housing staff do not need DBS checks to carry out their roles.

- 4.3.3 The Council's safeguarding policy contains enough guidance for staff to use it as a top-up training tool. It details the relevant procedures and identifies the safeguarding representatives for each service area. The staff interviewed as part of the audit were aware of their role in safeguarding and were able to explain the process followed when reporting concerns. Safeguarding is also included as part of the Housing staff appraisals.
- 4.3.4 Housing staff receive a wide range of training appropriate to their role in addition to the mandatory staff training. This includes safeguarding training which is completed every 3 years to ensure the guidance and information is current. Extra top-up and refresher training is available for staff to complete using Wilma (training system). Safeguarding training for housing staff was last completed in 2019.
- 4.3.5 Additional training on County Lines, which included trafficking and a number of safeguarding elements, was completed in early March 2020. No other physical safeguarding training has been able to be provided since the first lockdown in March 2020.
- 4.3.6 New starters receive 'conflict management and lone working' training at the start of their employment, along with other mandatory courses such as 'fraud awareness' and 'health and safety'. There is other opt-in training available for staff which could be beneficial for those staff working with tenants and carrying out home visits. These include 'basic substance misuse awareness', 'disability confident' and 'LGBT+ inclusion awareness' courses.
- 4.3.7 The Intranet site gives staff access to the 'staff alert list', a list of members of the public where caution should be taken when carrying out visits to them. The list is easy to find and use. Before completing a search there is a reminder that searches should be for legitimate reasons and the user should abide by the data protection act.
- 4.3.8 The alert list is kept up-to-date using intel provided by the police and WDC staff. Reports of concerns are passed to the alert list team who review the information and, where appropriate, add the person to the list. Relevant

information is also shared with contractors to reduce their risk when entering properties.

- 4.3.9 There are various risk assessments and supporting policies in place relevant to the duties that Housing staff carry out. These cover lone working, using a mobile phone when driving and carrying out generic visits. The risk assessments and policies are available on Assessnet (software which manages the Council's risk assessments) and on the intranet. The service area risk register also includes relevant risks and signposts policies, procedures and risk assessments.
- 4.3.10 There are a number of Covid-related risk assessments, policies and procedures in place to help keep staff safe when working in the office and visiting properties. These include hand sanitising stations, Covid-safe working and procedures to follow when the staff member has been exposed to the virus. The generic visit risk assessment has been updated to ensure Covid-safe working and PPE is available to staff when carrying out visits.

4.4 **Tenancy visits**

- 4.4.1 Tenancy update visits (TUVs) are completed once every three years apart from high rise properties which are completed annually. The process for completing these visits is to send a letter to the tenant with an appointment, giving them the opportunity to rearrange it if needed. A copy of the letter should be stored in the tenants file. When the visit is completed a note with the details should be added to ActiveH. This process is not documented so could only be confirmed verbally with the Senior Housing Officers. TUVs allow the opportunity to check the condition of the asset, ensure contact details are up-to-date and that the details of tenant are still valid.
- 4.4.2 As well as the TUVs there are additional visits completed as part of tenancy management. New tenants should be visited within four to six weeks to see how they are settling in. An additional visit is then completed at twelve months when the tenant will sign a secure tenancy and receive the accompanying document pack. When tenants complete a mutual exchange application, a visit must be completed within 42 days (Housing Act; Mutual Exchanges).
- 4.4.3 A report can be run and accessed through Ripplestone (report viewing software) which shows the status of visits completed and due. This only works if TUVs are recorded correctly on ActiveH through the visit log and not through diary entries. The report only shows TUVs recorded since 2016 as this is when the method of recording them was implemented.
- 4.4.4 The report showing the status of TUVs was reviewed. The report displayed the asset ID, tenant name, asset address, last TUV date, outcome and next TUV due date. The report shows that 36% of properties do not have a TUV recorded on the system, 26% have had a visit previously but are now overdue their next one, 2% have a visit due within the next four weeks and 36% have had visits within the last three years (one year for high rise).

- 4.4.5 A sample of 20 current tenancies were reviewed. The sample included ten randomly selected new tenancies from within the last 24 months. The other ten were older tenancy agreements where the TUV report confirmed a visit had been completed. Nine of the ten newer tenancies showed no visits having been completed in the diary notes or in the visits section of the system. The other one from this range had a diary note in place to say that a settling-in visit had been carried out over the phone. All of the older tenancies in place had visits recorded on the visit section seven had the TUV document on file; only two had the settling-in visit document saved. One from the sample of 20 had a visit appointment letter saved to their file. Fourteen of the 20 had a signed tenancy agreement on file. The lack of information and documents stored does not provide sufficient evidence to support the visits carried out or to show that 24 hours' notice is being provided.

Risk

There may be a risk of the Council breaching the tenancy agreement in place and visits being ineffective.

Recommendation

All relevant documentation should be stored and recorded correctly to show that the Council is compliant with the tenancy agreement.

- 4.4.6 The location of document storage depends on which system was in place at the time of storage. More recent documents (2016 onwards) should be available on ActiveH; documents previous to this are saved to shared housing drives.
- 4.4.7 There is no documented procedure in place for visits and the TUV reporting facility is not used to its potential. Instead, Housing officers rely on monitoring their own patch from the moment the lettings team hand over the tenant details to them.

Risk

Without a documented procedure in place the recording of visits and saving documents may be completed differently by each Housing officer.

Recommendation

There should be a procedure in place for Housing officers to follow to ensure the same process is followed when logging visits and saving relevant documentation.

4.5 Tenancy Management

- 4.5.1 The secure tenancy agreement booklet sets out the terms and conditions of the tenancy for both the Council and the tenant. The booklet is well set out,

clear and easy to understand and available in other formats and languages on request.

- 4.5.2 The service area plan for housing includes a number of measures, most of which are covered in other audits. The measures relevant to this audit are: percentage of tenancies failed within 18 months; number of evictions (not through rent arrears); ASB cases closed within six months; and gas safety checks completed within the last 12 months.
- 4.5.3 Gas checks must be carried out at all active Council properties on an annual basis. There is a nine-week window where the checks must be completed. Gas checks are carried out by the appointed contractor, D&K Heating, on behalf of the Council. They are provided with a list of current tenants and the relevant address so they can organise the checks. It is believed that D&K Heating contact the tenant to offer an appointment with an option to re-arrange. No evidence of this was found on ActiveH but D&K Heating are likely to issue and manage the initial letter themselves. If they fail to gain access to the property when an appointment has been arranged D&K Heating contact the Housing officer who will then make contact with the tenant to re-arrange it.
- 4.5.4 A report was run for the auditor showing the status of gas checks completed and outstanding. The report showed 30 outstanding, ten of which were reviewed on ActiveH to see what steps had been taken. It was noted that only two had records of communication with the tenant regarding the gas check needing to be completed. When reviewing the information, it appeared that the tenant had been in touch to raise an issue and had been reminded at that point.
- 4.5.5 When a TUV is completed all tenants listed at the property are checked. This helps in succession cases as it helps to evidence succession rights. Succession rights are established when evidence shows that the successor has used the property as their main address for a minimum of twelve months. When the evidence supports this the tenancy is signed over to them.
- 4.5.6 Through discussions with the Senior Housing Officers and Housing Officers it was made clear that there was no way to find and review where succession cases had been carried out other than asking individual officers to signpost to cases they could remember. Due to the difficulty in obtaining the information required, testing could not be completed to show that the checks had been carried out correctly and that supporting documentation had been retained.
- 4.5.7 As mentioned in para. 4.5.6, above, it was confirmed that there was no way of identifying cases where tenants had been evicted. This meant that testing could not be completed to review the documentation stored to support the eviction.
- 4.5.8 Similarly, as there was no way of identifying cases where the tenancy had ended within 18 months, testing in this area could not be undertaken.
- 4.5.9 Antisocial Behaviour is covered in section 4.8, below.

4.5.10 There would have been a recommendation made for paragraphs 4.5.6 – 8 however, discussions with the business administration team established that reports for the KPIs included in the service area plan could be produced to allow a review of the information. It would require the information for each case to be stored accurately so the system could identify it within the parameters set. The Landlord Operations Manager has begun reviewing the information required and working with the business administration team to set up appropriate reports for future use.

4.6 **Mutual exchanges**

4.6.1 Checks must take place before a mutual exchange can complete. The checks have to be completed within 49 days of an application being received (Housing Act). This involves a visit to review the condition of the property and any issues that would need to be resolved for the exchange to complete. The current tenant signs a copy of this to show they agree to any changes.

4.6.2 Mutual exchanges are not logged onto ActiveH until both parties are ready to complete. They are managed by the Housing officer from when the application to exchange is received. Once all checks have been completed and the exchange is ready to complete, the property is put on manual void and the documents are uploaded.

4.6.3 A sample of twelve mutual exchanges completed since April 2019 were reviewed. Two of the twelve had application forms saved to the file. Although eight had the signed exchange document, only one had a pre-exchange check document stored. Three of the sample had had a TUV completed during the application process with documents saved to support the visit. None of the sample had diary notes to show a pre-exchange visit had been completed. With so little data available to review it is not possible to say whether pre-exchange visits have been completed within the time frame set out in legislation.

Risk

The lack of available documentation may result in the Council breaching legislation.

Recommendation

The application for the mutual exchange together with other relevant documents should be saved to the tenants or house file. A formal procedure for officers to follow when processing applications for mutual exchanges, should be produced.

4.7 **Garage management**

4.7.1 The garage rental agreement clearly sets out the terms and conditions of garage rental, identifying the tenant as responsible for the internal maintenance and the Council responsible for the exterior.

- 4.7.2 The Senior Housing Officers confirmed that garage checks should be completed monthly. This is an external check only so the tenant does not need to be contacted. Although visits by Housing officers have not been undertaken due to the ongoing pandemic it was confirmed that there was no reason why garages could not be visited. However, interviews with Housing Officers revealed that monthly checks had not been completed for a long time as the officers were unsure of what they were able to do whilst the pandemic was ongoing.
- 4.7.3 Although there have been new starters taken on specifically to cover garage tenancy management they have not yet started work on them. This is due to staff not knowing what tasks need to be completed and how they are to be completed. There are no written processes or procedures in place. The knowledge of the garage tenancy management role was lost when the staff member who carried it out sadly passed away.

Risk

The Council could be in breach of the tenancy agreement and could incur a loss of income where garage management is ineffective.

Recommendation

The duties for garage tenancy management should be agreed and documented in a formal procedure to ensure the Council's assets are maintained and rent is collected as due.

- 4.7.4 A sample of 24 active garage accounts were reviewed. Thirteen of the sample had signed agreements saved to ActiveH. These were all recent lets where the new tenant had posted or emailed the document in. Two of the signed agreements had not been completed correctly; although they had been signed they had not completed the accept/decline section correctly. Thirteen of the sample had no arrears at the time of checking with the remaining eleven only having minor arrears of a month or less. Only one had an inspection logged within the last two years - this was due to an officer meeting a previous tenant to provide access where locks had been changed.
- 4.7.5 Additional active garage accounts were checked at random to find cases where diary notes had been added. These checks revealed a lack of external checks being completed as a number of the notes were from tenants calling the Council to request that bushes and brambles be cut back to allow access to the sites, or that rubbish be removed or to request other external maintenance activities.

Risk

Lack of site visits could result in garages being used inappropriately and provide an opportunity for vacant sites to be used for antisocial activities.

Recommendation

To help ensure garages are used as intended and looked after by tenants, site checks on the external environment of the garages should be completed and logged onto the relevant file. A formal procedure detailing how officers should manage garages will need to be produced.

4.8 Complaints and Antisocial Behaviour

- 4.8.1 The Council has an Antisocial Behaviour Policy in place which was approved in 2017. The policy is available publically on the Council's website within the housing pages.
- 4.8.2 Complaints (including ASB) come in to the Council via telephone calls or emails to the generic housing email address. The complaint is passed directly to the relevant Housing Officer who is then responsible for logging the complaint and managing it.
- 4.8.3 There is no central record to monitor the number of complaints received, outcome or timeliness of resolving the complaint. The Senior Housing Officer advised that each Housing Officer would need to be asked for this information. One of the KPIs in the service area plan measures the percentage of ASB cases closed within six months. However, the lack of a central register prevents easy review and monitoring of complaints.
- 4.8.4 Access to the complaints module was not provided to the auditor so full testing could not be completed. The Landlord Operations Manager reviewed a selection of cases on the auditor's behalf and found there to be insufficient information stored for a number of the cases reviewed. In some cases, this made it difficult to identify what the complaint was about and what actions had been taken. In general, there was limited evidence of correspondence with the complainant.
- 4.8.5 There is no written procedure in place setting out the process to follow in respect of the recording of complaints. This could account for the varied quality of data and information stored on the system.

Risk

The absence of a written procedure for the recording of complaints and the consequent variation in the quality of data held on the system could result in complaints being misunderstood or left unmanaged. Also a lack of robust management information means that any necessary remedial action cannot be undertaken.

Recommendation

A written procedure to guide staff on the recording of complaints should be established.

5 Summary & Conclusion

5.1 When reviewing the various aspects of the tenancy management function it is apparent that the Housing Officers follow different process with no standard way of working in place. The implementation of a manual with documented procedures will help to streamline the processes resulting in a more effective service. Discussions between the Landlord Operations Manager and the business administration team will help to set up and schedule reports that are useful, relevant and in line with the KPIs and measures set in the service area plan.

5.2 Following our review, we are able to give a MODERATE degree of assurance that the systems and controls that are currently in place in respect of Tenancy Management are appropriate and are working effectively.

5.3 The assurance bands are shown below:

Level of Assurance	Definition
Substantial Assurance	There is a sound system of control in place and compliance with the key controls.
Moderate Assurance	Whilst the system of control is broadly satisfactory, some controls are weak or non-existent and there is non-compliance with several controls.
Limited Assurance	The system of control is generally weak and there is non-compliance with controls that do exist.

5.4 There were issues identified during the course of the audit relating to:

- Coverage of the phone system.
- Potential for the Council to breach tenancy agreements and for visits to be ineffective.
- Absence of a procedure for the recording of visits and saving of related documents.
- Lack of supporting documentation to show that mutual exchanges are completed in compliance with legislation.
- Management of garage tenancies and monitoring of the sites.
- Lack of written procedures and document Storage regarding complaints.

6 Management Action

6.1 Recommendations to address the issues set out above are reproduced in the attached Action Plan (Appendix A) for management attention.

Richard Barr
Audit and Risk Manager

Action Plan

Internal Audit of Tenancy Management – March 2021

Report Ref.	Recommendation	Risk	Risk Rating*	Responsible Officer(s)	Management Response	Target Date
4.2.9	<p>A review should be completed of the phone duty rota and procedure to ensure busier shifts are covered and so calls abandoned are kept to a minimum.</p> <p>Call waiting messages could be played reminding customers of the other ways to make contact, encouraging a channel shift towards using the website or email.</p>	The Council's reputation may be affected adversely by calls not being answered or customers waiting online for an excessive amount of time.	Low	Landlord Services Manager and Landlord Operations Manager	<p>A review of the phone rota's in line with housing officers' duties of been on patch will be undertaken in April.</p> <p>Opportunities to move more services on line will be explored and comparisons of telephone performance will be undertaken.</p>	30 April 2021
4.4.5	All relevant documentation should be stored and recorded correctly to show that the Council is compliant with the tenancy agreement.	There may be a risk of the Council breaching the tenancy agreement in place and visits being ineffective.	Medium	<p>Landlord Operations Manager</p> <p>Senior Housing Officer</p>	<p>The Landlord Operations Manager is working on a set of procedures for Officer's to follow, relating to all functions of the Landlord Operations Team.</p> <p>These procedures will include storing of documents.</p> <p>Housing Services will review the use of IT equipment which could save straight to Active H using whilst on site, using devices such as iPads.</p>	<p>July 2021</p> <p>September 2021</p>

Report Ref.	Recommendation	Risk	Risk Rating*	Responsible Officer(s)	Management Response	Target Date
4.4.7	There should be a procedure in place for Housing officers to follow to ensure the same process is followed when logging visits and saving relevant documentation.	Without a documented procedure in place the recording of visits and saving documents may be completed differently by each Housing officer.	Low	Landlord Operations Manager	The Landlord Operations Manager is working on a set of procedures for Officer's to follow, relating to all functions of the Landlord Operations Team. This will include Tenancy Visits and saving of relevant documentation.	June 2021
4.6.3	The application for the mutual exchange together with other relevant documents should be saved to the tenants or house file. A formal procedure for officers to follow when processing applications for mutual exchanges, should be produced.	The lack of available documentation may result in the Council breaching legislation.	Medium	Landlord Services Manager	The Landlord Services Management Team are working on a set of procedures for Officer's to follow, relating to all functions of the Landlord Operations Team. This will include a guide on handling applications for Mutual Exchanges on HPM.	July 2021
4.7.3	The duties for garage tenancy management should be agreed and documented in a formal procedure to ensure the Council's assets are maintained and rent is collected as due.	The Council could be in breach of the tenancy agreement and could incur a loss of income where garage management is ineffective.	Medium	Landlord Services Manager	The Landlord Services Management Team are working on a set of procedures for Officer's to follow, relating to all functions of the Landlord Operations Team. This will include a guide on managing garages.	June 2021

Report Ref.	Recommendation	Risk	Risk Rating*	Responsible Officer(s)	Management Response	Target Date
4.7.5	To help ensure garages are used as intended and looked after by tenants, site checks on the external environment of the garages should be completed and logged onto the relevant file. A formal procedure detailing how officers should manage garages will need to be produced.	Lack of site visits could result in garages being used inappropriately and provide an opportunity for vacant sites to be used for antisocial activities.	Medium	Landlord Operations Manager	The Landlord Operations Manager is working on a set of procedures for Officer's to follow, relating to all functions of the Landlord Operations Team. This will include a guide on managing garages to include site checks.	June 2021
4.8.5	A written procedure to guide staff on the recording of complaints should be established. Also a lack of robust management information means that any necessary remedial action cannot be undertaken.	The absence of a written procedure for the recording of complaints and the consequent variation in the quality of data held on the system could result in complaints being misunderstood or left unmanaged.	Medium	Landlord Operations Manager	A procedure for managing complaint so Anti-Social Behaviour has been written. It is awaiting sign off by Landlord Services Manager. Training on the new procedure is arranged for 9 March 2021.	March 2021

* Risk Ratings are defined as follows:

High Risk: Issue of significant importance requiring urgent attention.
Medium Risk Issue of moderate importance requiring prompt attention.
Low Risk Issue of minor importance requiring attention.