

Slough Borough Council

Report To:	Audit and Corporate Governance Committee
Date:	30 June 2025
Subject:	Update on Outstanding Housing Internal Audit Recommendations
Chief Officer:	Pat Hayes – Executive Director Property & Housing
Contact Officer:	Lisa Keating – Director of Housing
Ward(s):	All
Exempt:	NO
Appendices:	Appendix 1 - Housing Internal Audit Recommendations – action plan.

1. Summary and Recommendations

1.1 This report sets out the progress to date and next steps to close out the Housing internal audit recommendations. Financial pressure in Temporary Accommodation is the top corporate risk for the Council. The Ministry of Housing, Communities & Local Government. (MHCLG) meets with the service monthly to provide support and monitor progress. The Corporate Leadership Team have continued to focus on Temporary Accommodation on a weekly basis to address the known issues, find solutions and deal with the emergence of new issues as they arise.

The Government has acknowledged the specific challenges in Slough and has significantly increased the 2025/26 Homeless Persons Grant along with the Rough Sleepers Grant so the service can recruit and introduce a Prevention strategy and Plan. In June 2025, the Director of Housing briefed the new member for Housing was briefed on Housing issues on this report and will provide regular monthly updates going forward.

Recommendations:

Committee is recommended to:

- a. Note the contents of this report.
- b. Seek assurance that management actions to address control weaknesses are progressing as part of the Housing Service Improvement Plan (HSIP) and the Temporary Accommodation (TA) Recovery Taskforce and the revised target date for closure; and
- c. The revised dates to close recommendations recognising the need to align appropriate resources and deliver the council's financial recovery and improvement journey.

Reason: work on the recommendations is ongoing requiring careful co-ordination and integration with other Council departments.

Commissioner Review

This report is outside the scope for pre-publication commissioner review; please check the [Commissioners' instruction 5 to CLT to sign off papers](#) for further details.

2. Report

Introductory paragraph

It should be noted that during the monitoring period housing has had significant staff churn including the departure and re-recruitment of three heads of service.

In January 2025 the Regulator for Social Housing notified us they would be carrying out an inspection to grade us based on how well we are meeting the requirements of the new consumer standards which came into force in April 2024. The Onsite Inspection took place in April 25 and the judgement will be published on 25 June 2025. This was seen as an opportunity to reassess our approach to a number of recommendations including the finalisation of the housing strategy and related strategies such as the homelessness strategy.

We are working to ensure we are compliant with the Consumer standards so we can contribute to restoring trust and confidence in SBC: ensuring that we are reliable, responsive, and open, as we continue to recover and improve.

- 2.1 There are 28 recommendations in the report of which 6 are high risk and 22 medium / low risk. At the end of Q4 2024/2025 (April 2025) 19 recommendations were fully or partially complete with evidence submitted or ready to submit with 9 recommendations outstanding awaiting evidence to submit.
- 2.2 The following table provides a summary of the audit recommendations. Appendix 1 contains updated information on the Recommendations including management actions required to complete partial and not completed recommendations. These actions are being co-ordinated through the Housing Service Improvement Plan.

Evidence to submit ready?	Risk Level	Partial	Full	Total
Y	H	3	1	4
	M/L	9	6	15
Y Total		12	7	19
N	H	0	2	2
	M/L	0	7	7
N Total		12	16	9
Total Risks				28

- 2.3 Based on the management assessment of audit recommendations, 7 (25%) of recommendations are deemed to have sufficient evidence to submit to Internal Audit with a further 12 (43%) in a position to submit partial evidence with further work underway. The remaining 9 (32%) recommendations require further action with the latest target date for 2 of the recommendations slipping to December 2025.
- 2.4 There are two high risk recommendations which have not progressed. One relates to a computer software upgrade which impacts the collection of rents. The other relates to the Tenancy Commencement and Sign-Up policy. Although work started on this

this recommendation it was re-assessed as part of the Regulator for Social Housing Inspection.

- 2.5 There are seven medium / low recommendations which have not progressed. Three recommendations are the responsibility of Housing and are being reviewed subject to the outcome of the Regulator of Social Housing Inspection. Due to structure changes, we are working with Digital Data and Technology, Finance and Grounds Maintenance on Four recommendations where responsibility now falls as we are heavily reliant on their input to resolve.
- 2.6 Other recommendations are progressing with partial evidence available. For example, the timely creation of temporary accommodation (TA) rent accounts has been resolved by allowing the TA team to undertake property creation in NEC. Dip sampling of tenancy terminations in HRA homes is now being undertaken following the appointment of a new head of service. Service Charges to leaseholders is now well establish 'business as usual' with re-charges to tenants on-track for implementation in 2026/27.
- 2.7 The Housing Team continues to deal with legacy issues dating back to 2022. For example, the implementation of ICT systems that do not integrate, directly impacts the ability to track homelessness and temporary accommodation as well as rent collection (HRA and TA) and service charges. The disbandment as part of the historic Our Futures whole council restructure and subsequent re-instatement of the service charge team has significantly impacted on processes and procedures which are now being embedded into the teams responsible.
- 2.8 Through a combination of the Housing Service Improvement Plan, the TA Taskforce and formal recommendations from the Regulator for Social Housing, the Committee should have confidence that the recommendations will be delivered by the end of December 2025.

Options considered.

Management is responsible for implementing recommendations arising from internal audits. As part of the audit process, managers have an opportunity to comment on the deliverability and timescales for audit recommendations. Once the final audit is agreed, the recommendations should be implemented within the timescales. If recommendations are no longer relevant or timescales undeliverable, discussions can take place with internal audit to agree amended recommendations.

Failure to comply with auditor recommendations is a sign of poor governance. Whilst there is no obligation to report publicly to committee on compliance, this is recommended for transparency reasons to provide a context for significant numbers of outstanding audit recommendations, especially when these are high or medium risk.

Background

The new standards cut across many of the recommendation in this audit and ensure we:

- Keep our tenants are safe in their homes.
- listen to our tenants' complaints and respond promptly to put things right.
- Are accountable to our tenants and treat them with fairness and respect.

- Know more about the condition of every home and the needs of the people who live in them.
- Collect and use data effectively across a range of areas, including repairs.

Social Housing (Regulation) Act

From 1 April 2024, there are 5 new consumer standards that will set the requirements all registered providers must meet:

- 1) The Safety and Quality Standard – requires landlords to provide safe and good quality homes and landlord services to tenants.
- 2) The Transparency, Influence and Accountability Standard – requires landlords to be open with tenants and treat them with fairness and respect so that tenants can access services, raise complaints, when necessary, influence decision-making and hold their landlord to account.
- 3) The Neighbourhood and Community Standard – requires landlords to engage with other relevant parties so that tenants can live in safe and well-maintained neighbourhoods and feel safe in their homes.
- 4) The Tenancy Standard – sets requirements for the fair allocation and letting of homes and for how those tenancies are managed and ended by landlords.
- 5) Tenant Satisfaction Methods (TSMs) – requires landlords to provide certain information to the Regulator of Social Housing based on resident feedback, such as repairs, safety checks and complaints.

3. Implications of the Recommendation

3.1 *Financial implications*

3.1.1 The report provides an update on progress against prior years audit recommendations for Committee to review. Whilst there are no direct financial implications arising from the recommendations, temporary accommodation continues to represent the greatest area of financial risk to the Council, as highlighted in the Q4 Corporate Risks report which is a separate item on this agenda, and inadequate systems and processes will in all likelihood contribute towards that financial risk.3.1.2 The failure to close down recommendations in a timely manner, further exposes the Council to those financial risks and an internal control framework which is not robust and effective.

3.2 *Legal implications*

3.2.1 There are no direct legal implications arising from this report. Failure to address those risks associated with the Directions from the Ministry of Housing, Communities & Local Government (MHCLG) will impact the ability to secure the Authority's compliance with the requirements of Part I of Local Government Act 1999. The Council has specific legal duties in relation to certain areas, such as providing advice and assistance for individuals at risk of and experiencing homelessness, landlord duties for tenants and health and safety responsibilities. Effective internal audit is a key part of providing assurance on the adequacy of governance, risk management and internal control.

3.3 *Risk management implications*

- 3.3.1 We will know the outcome of the Inspection by the Regulator of Social Housing in late June 2025. Some of the recommendations relate to the Consumer Standards so there will be additional scrutiny on these areas and we will review our improvement plans to take account of the regulatory judgement.
- 3.3.2 The internal audit recommendations have been evaluated by Internal Audit as either high, medium, or low risk.
- 3.3.3 Management are aware of their responsibilities in ensuring that action is taken to respond and close out the recommendations.
- 3.3.4 The Housing Service Improvement Plan (HSIP) is in final draft and will be reported on Cabinet in Q2 following the Judgement from the Regulator of Social Housing which will be publicised on 25 June 2025. Elected Members and senior officers, including the Chief Executive (who holds a dual role as a commissioner) engaged in the inspection process and will have full sight of the inspection outcome and action plan that results from that when it is published. Currently the plan has five workstreams and a dedicated programme manager who meet with workstream leads on a regular basis.
- 3.3.5 A summary of the draft plan was shared with the Regulator for Social Housing in April 2025. The plan is monitored via monthly meetings chaired by the Director of Housing who will report progress into the Recovery board, Health & Safety Board as well as the Residents Board the Strategic Director of Property & Housing will update Corporate Leadership Team on a quarterly basis.
- 3.3.6 The TA Recovery Taskforce was launched in February 2025. The taskforce tracks all aspects of homelessness and temporary accommodation at a granular level. The recovery project team is chaired but the Director of Housing, has a dedicated programme manager and reports weekly to an oversight panel including the section 151 officer, the Interim Director of Finance and the Director of Revenues and Welfare Services. The Taskforce reports monthly to Commissioners and the Housing Portfolio holder.

3.4 *Environmental implications*

- 3.4.1 There are no direct environmental implications from this report.

3.5 *Equality implications*

- 3.5.1 There are no direct equality implications arising from this report. Homeless assessment is governed by primary legislation Homeless Reduction Act 2017 which has equality matters embedded and ensures a consistent approach to assessment and TA allocation. However, individuals with certain protected characteristics will be more likely to require services and support from the housing directorate and the Council has obligations to consider its Equality Act duties when making decisions about housing and homelessness support, including at a policy and individual case level.

3.7 *Workforce implications*

- 3.7.1 An additional 11 housing demand officers are required to deal with backlog issues and on-going homeless prevention and assessment. An additional 6.5 TA staff are

being recruited to deal with TA backlog. An additional 9 officers are to be recruited to the TA team to deal with on-going demand for TA.

3.8 *Property implications*

3.8.1 There are direct property implications arising from this report.

3.9 *Corporate Parenting Implications*

3.9.1 A corporate parent refers to the collective responsibility of local authorities and partner agencies to provide the best possible care and safeguarding for looked-after children (LAC) and care leavers, acting in the role of a parent in terms of support, protection, and outcomes. Care leavers aged 18 to 20 automatically have priority need for temporary accommodation under housing legislation (Housing Act 1996, as amended). Temporary accommodation for care leavers should reflect the stability, safety, and support expected from a responsible parent. This includes avoiding the use of unsuitable B&Bs or nightly lets, unless necessary and for the shortest time possible. The implementation of the recommendations linked to the provision of TA therefore have a direct impact.

4. **Background Papers**

4.1 None