

Financial control – Direct Debits

Internal Audit Report

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Date of issue: 16 June 2025

Reference: Version 2.0

Table of Contents

Executive Summary	4
<hr/>	
Background	4
Key findings	4
Key recommendations	5
Introduction	6
Scope	7
Approach	8
Findings	10
<hr/>	
Problem definition	10
Set Up	12
Collection	13
Reconciliation	14
General	15
Recommendations	16
Is this a Housing specific or Council-wide Direct Debit issue?	21
Is there further work required in other areas?	22
Annex 1: Distribution	23
Annex 2: Interviews conducted	24
Annex 3: Documents reviewed	25
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Executive Summary

Background

This report presents the findings and recommendations of an internal audit review of the Direct Debit financial controls at Slough Borough Council (SBC), requested by the Executive Director of Corporate Resources. The review was initiated following identification by the Counter Fraud team of Direct Debit (DD) leasehold transactions drawing money out of the Council's Direct Account (An income only account). Consequently, the processes involved in Housing rental and leasehold Direct Debit (DD) income collection are the subject of this review.

Key findings

The review involved interviews with key personnel in Housing, Digital Data and Technology (DDaT) and Finance, as well as an examination of relevant documents.

The initial issue of a DD being set up on the Council's Direct Account has been resolved by Lloyds Bank putting in place a safeguard to 'block' the setting up of new DDs. However, the scope of the review is broader than the initial issue and follows two key lines of enquiry:

- How can a DD instruction be set up when the payer's name does not match the payer's bank account details?
- Why are DD collections returned? Can the returns be avoided? Are the returns being managed effectively?

SBC is responsible for verifying the bank account matches the payer's name, however, there is currently no verification carried out to confirm the payer's name on the bank account matches the account number and sort code.

DD amendments, cancellation or failure to collect is reported to SBC via the Paygate portal. This information must be manually actioned within the NEC system (system contains all Housing customer information) otherwise it will assume the payment has been successful and will present the same DD on the next payment cycle.

There is no management information reported regarding the number of DD payments returned and the reason for the return. This information should be monitored to ensure updates to the DDs are actioned in a timely manner.

The capability and capacity of housing income collection staff is reduced due to high staff turnover, sickness and high numbers of temporary staff. Income collection relies on the temporary NEC Implementation project team whose contract at SBC will be finishing soon.

The summary above represents the headlines; there are 21 key findings identified within the main body of the report that are addressed by the recommendations below.

Key recommendations

The report makes 10 recommendations; these have been summarised below. It is important to acknowledge that delivering the recommendations will require dedicated resource that has capacity to focus on delivering the detailed actions. Recommendations 1-5 address the key findings within Housing income collection:

- **Recommendation 1:** Ensure there are clearly documented Direct Debit (DD) processes that are the basis for staff induction and refresher training within Housing income collection.
- **Recommendation 2:** Implement system and process improvements for Payer Verification within Housing income collection.
- **Recommendation 3:** Review the resource requirements, roles and responsibilities for Housing income collection and the NEC System and design and implement a service focused on delivering the end-to-end DD process.
- **Recommendation 4:** Implement improvements in reporting and monitoring to inform effective Housing income collection governance meetings.
- **Recommendation 5:** Investigate opportunities to improve manual DD processes to increase staff efficiency, accuracy of data and availability of information.

Recommendations 6-10 address identified issues outside the scope of the initial review but require consideration by SBC:

- **Recommendation 6:** Conduct a review of the DD arrangements of other Council services in order to develop recommendations for improvement.
- **Recommendation 7:** Conduct a review of current SBC DD practice compared with the BACS Paperless Direct Debit Service User rules and the criteria agreed with the Sponsoring Payment Service Provider (PSP) for Paperless Direct Debit.
- **Recommendation 8:** Treasury and Reconciliation to engage with Lloyds to fully understand how DD adjustments and unpaid DD are itemised (credit and debit) within the bank account statement to ensure reconciliation is accurate.
- **Recommendation 9:** Conduct a review of the other SBC bank accounts to ensure any Direct Debit payments leaving the account have been reconciled.
- **Recommendation 10:** Conduct a review of the Manual Payments process in order to develop recommendations for improvement.

Further detailed rationale for the recommendations and actions to be delivered are included within the main body of the report.

Introduction

This report presents the findings and recommendations of an internal audit review of the Direct Debit financial controls at Slough Borough Council (SBC).

The review was initiated following the identification by the Counter Fraud team of Direct Debit (DD) leasehold transactions drawing money out of the Council's Direct Account. The Council's Direct Account should only process income, therefore, Direct Debit payments should not be set up to draw money out of the account. The Executive Director of Corporate Resources (S151 Officer) requested an urgent review of financial controls in place to address the identified weaknesses and to understand whether this is a Housing-specific or Council-wide issue.

The review assessed whether Slough Borough Council has in place adequate and appropriate DD policies, procedures and controls to ensure the accuracy and integrity of financial information, provides an opinion on the extent to which risks in this area are managed and provides recommendations for immediate and longer-term improvements.

Scope

The scope of the review is Housing rental and leasehold income collected by Direct Debit (DD). The review has documented the current processes for setting up and collecting DD income, including the controls in place to manage the risk of failing to collect all the Housing income. Housing Major Works and Temporary Accommodation are out of scope of this review.

The review documents the interaction between the income collection processes and the Reconciliation Team in Finance but does **not** review the processes within the Reconciliation Team because this was subject to a recently conducted separate internal audit review of Bank Reconciliation (Bank Reconciliation – Irregular Direct Debits, Audit reference: 05.24/25).

This document is the output of the review; it outlines a 'problem definition', an opinion on the extent to which this problem is currently being managed and recommendations for improvement. In addition, the review provides an understanding of whether this is a Housing specific or Council-wide issue and identifies whether further work is required in other service areas.

This review is an assessment of the internal control environment to assist management to improve the:

- Management of financial risk
- Monitoring of income collection performance
- Policies, processes and procedures
- Clarity regarding roles and responsibilities
- Resource effectiveness and efficiency
- Training of staff.

The review does not provide any guarantee against material errors, loss or fraud or provide an absolute assurance that material error, loss or fraud does not exist; and the results of our work are reliant on the quality and completeness of the information provided to us.

Approach

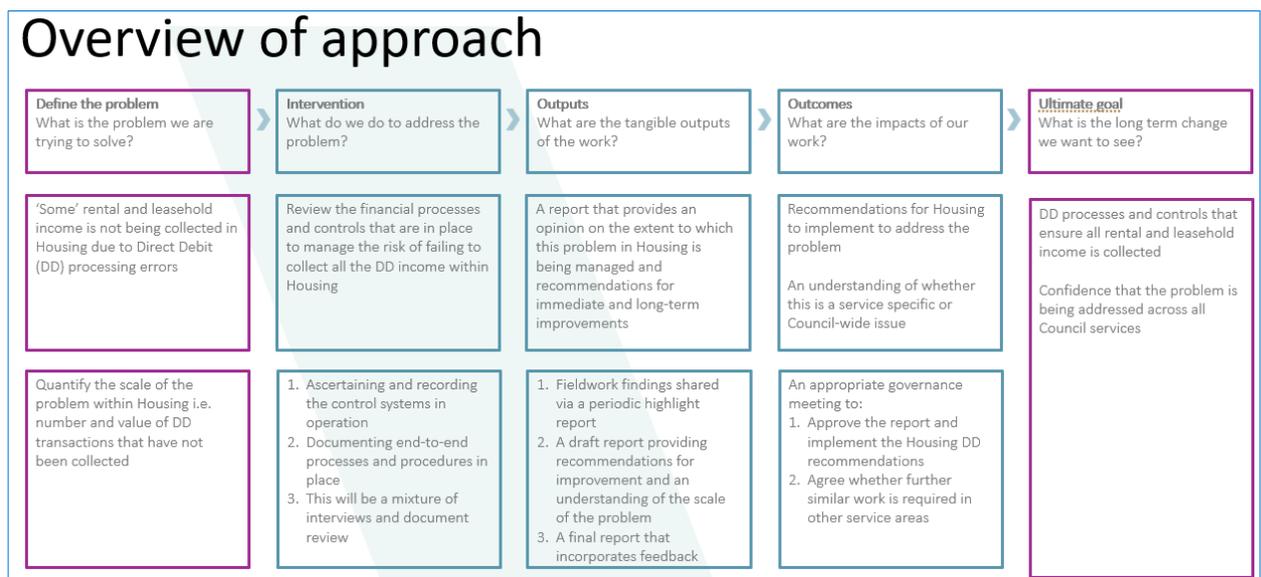
The review involved interviews with key personnel in the Housing, Digital Data and Technology (DDaT) and Finance Departments (see annex 2 for a full list of interviewees), as well as an examination of relevant documents (see annex 3 for a full list of documents).

The weaknesses identified by the Counter Fraud team and thus the focus of this review are:

1. A DD instruction was set up with both the Payer and Payee being SBC.
2. A DD instruction was set up for a Payer bank account that isn't eligible for Direct Debit.

These two weaknesses provide the key lines of enquiry to determine how and why the existing financial controls failed.

The diagram below provides an overview of the approach the review followed:



The approach aligns with the 'Financial Control - Direct Debits 2025/26 Draft Terms of Reference'. The table below outlines the stages and corresponding activities for the review and the agreed timeline that the review was completed within.

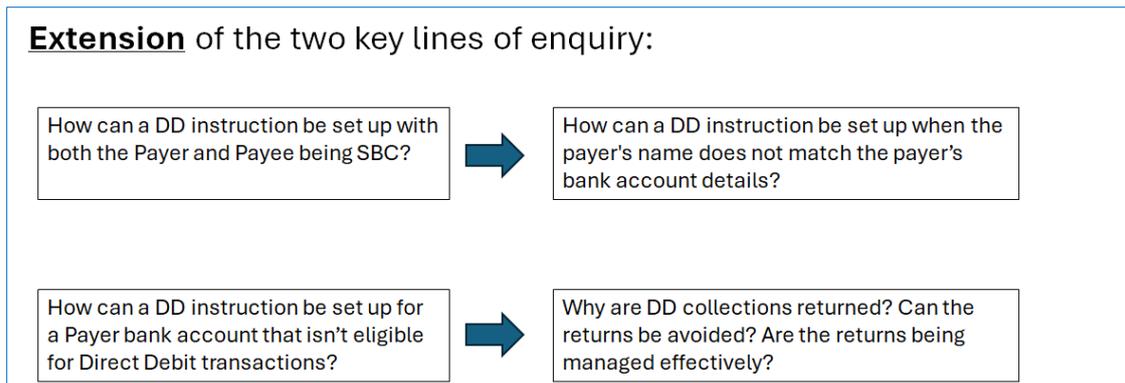
Ref	Stage	Activity	Due for completion
1	Mobilisation	Meet with key stakeholders to confirm approach, timeline and activities	9 th May
		Discuss and agree the key documents to be provided	
		Identify appropriate staff and schedule interviews	
2	Fieldwork	Review the key documents	6 th June
		Interview the appropriate service and finance staff	
		Meet with appropriate staff to quantify the scale of the problem	
		Develop a highlight report to share fieldwork findings	
3	Develop a draft report	Recommendations for improvement and an understanding of whether this is a service specific or Council-wide issue. Shared with key stakeholders for review.	16 th June
4	Final report and meeting to agree way forward	Feedback incorporated into the final version and key governance meeting attended to agree the wayforward	30 th June

The findings of this audit will be used to enhance SBC's control environment and ensure the integrity of its financial processes.

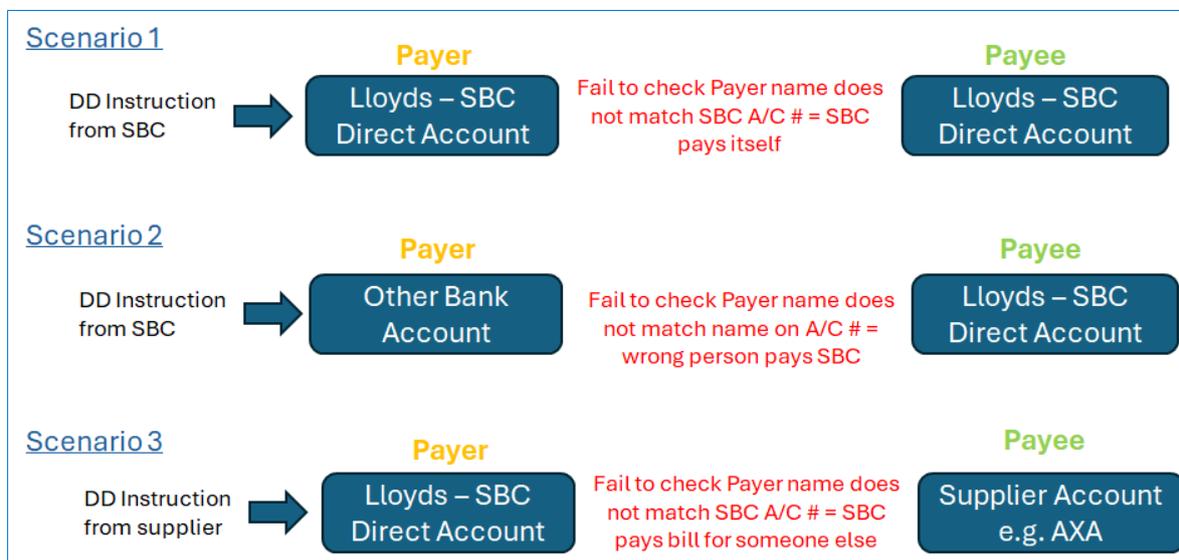
Findings

Problem definition

The two key lines of enquiry have been extended to encapsulate the wider DD financial control issues that exist within Housing income collection, see the diagram below:



There are three scenarios outlined in the diagram below where the DD instruction can be set up when the payer's name does not match the payer's bank account details i.e. the account number and sort code:



Where possible, the scale of the problem has been quantified where the DD instruction has been set up with a payer's name that does not match the bank account details for the SBC Direct Bank Account:

- **Scenario 1.** £179 of Housing income DD identified by the Fraud Team where both the payer and payee were SBC

- **Scenario 2.** SBC don't know how many Housing income DD instructions have been set up where the payer's name does not match the payer's bank account details because this is not checked or tracked when it has been identified
- **Scenario 3.** £45,315 of DD identified by the Fraud Team where the payer's name did not match bank account belonging to SBC. Please note that these DDs were **not** related to Housing income collection

It should be noted that these figures only represent the Direct Bank Account, SBC has many other bank accounts.

It is important to quantify the scale of the problem where the DD collections are returned:

- £1,189 of Housing income DD were identified by the Fraud Team where the payer's bank account was not eligible for DD.
- The management information for the number of DDs returned and the reason codes is not monitored or tracked, therefore, it is not possible to quantify. Anecdotally there are between 60-80 DDs returned each month in the Rent Team.

Some other key metrics (FY 24/25) to quantify the scale of the challenge for Housing Rent and Leasehold Income collection:

- There are 6,609 Rent and 1,485 Leasehold customer accounts
- Of these 2,090 Rent and 449 Leasehold customers pay by DD
- This equates to £11.1M in Rent and £510K Leasehold income per annum paid by DD
- There is £4.4M arrears in Rent and £1.9M arrears in Leasehold
- £187K debt has been written off in Rent.

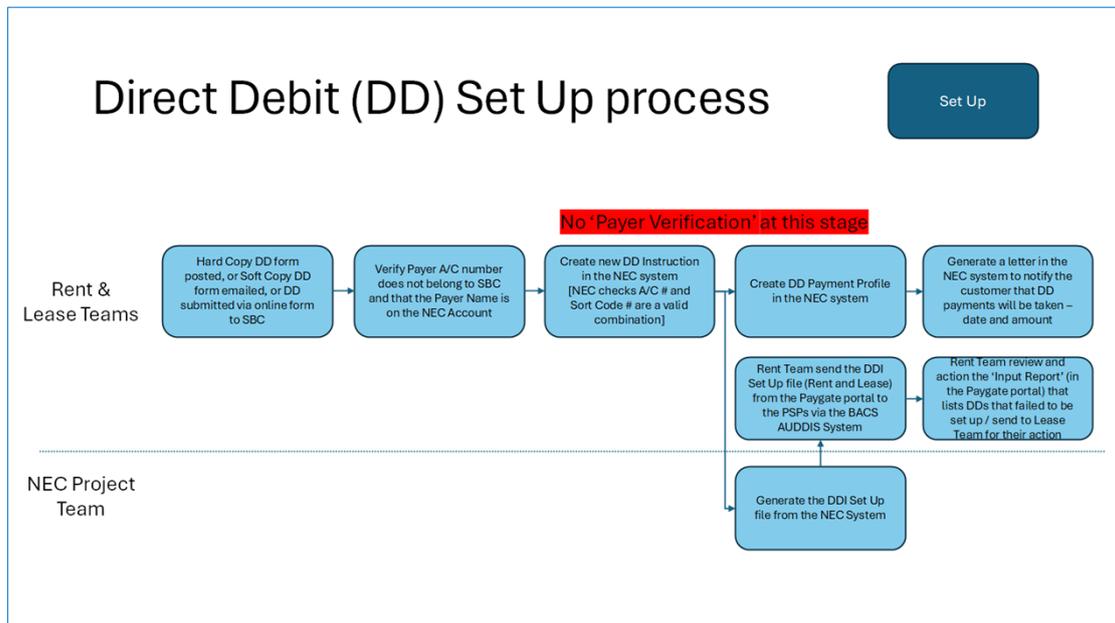
Returned DD payments and the time taken to resolve them will have an impact on the level of arrears and ultimately the levels of debt written off. Whilst the 'snapshot' of the above information is helpful, it is important that SBC look at trend analysis information for the above metrics in order that service managers can take corrective action when necessary.

The diagram below illustrates the high-level end to end DD process, the following sections will provide more detail behind the 'Set Up', 'Collection' and 'Reconciliation' processes.



Set Up

The Set Up process diagram below outlines the high-level process steps carried out by the staff in the Rent, Leasehold and NEC Project Teams.

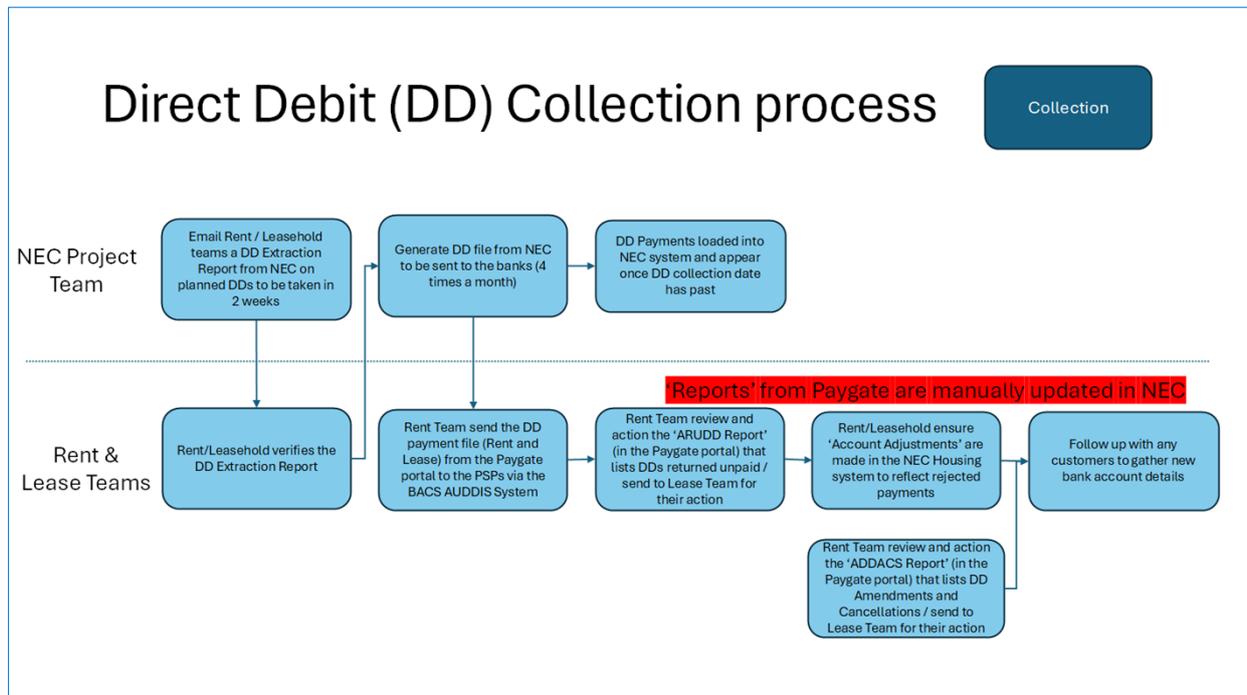


The **Key Findings (KF)** from the review of this process are:

1. Staff perform a DD manual check to ensure the payer bank account does not belong to SBC and that the name on the bank account is either a joint tenant or a family member listed on the account; this may not always happen because it relies on existing and new staff knowing or remembering to check.
2. SBC is responsible for verifying the bank account matches the payer's name. The NEC system performs a 'Modulus' check which validates the sort code and account number are a valid combination. There is no verification carried out to confirm the payer's name on the bank account matches the account number and sort code.
3. There is one SBC member of staff across Rent and Leasehold who has the access and capability to utilise the Paygate portal to submit the DD AUDISS setup file and to access the BACS Reports in the BACS system. This is a single point of failure for SBC.
4. The BACS 'Input Report' provided by the Paygate portal provides information regarding any DD instructions that have been rejected by the Payer's PSP. This report will need to be manually actioned within the NEC System to cancel the DD.
5. The DD Set Up process relies on the temporary NEC Implementation project team whose contract at SBC will be finishing soon. The processes they perform will need to be picked up by other staff.

Collection

The Collection process diagram below outlines the high-level process steps carried out by the staff in the Rent, Leasehold and NEC Project Teams.

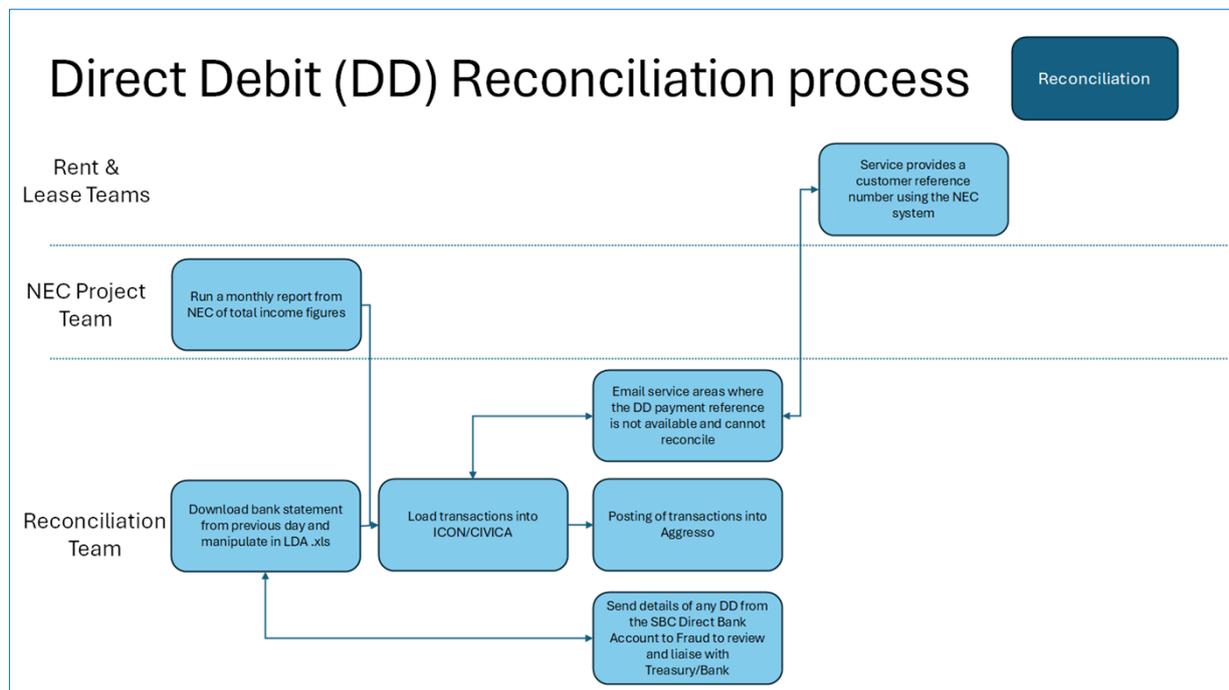


The **Key Findings (KF)** from the review of this process are:

6. At least some of the PSPs are not carrying out payer verification checks to ensure the information within the payment file (name, account number, sort code) match. This will lead to a failed collection where the money will be returned from SBC to the Payer.
7. Notifications of DD amendments, cancellation or failure to collect is reported via the Paygate portal (ADDACS and ARUDD reports). This information needs to be manually actioned within the NEC system otherwise it will assume the payment has been successful and will present the same DD on the next payment cycle.
8. There is no management information reported regarding the number of DD payments returned and the reason for the return. This information should be monitored to ensure updates to the DDs are actioned in a timely manner.

Reconciliation

The Reconciliation process diagram below outlines the high-level process steps carried out by staff in the Rent, Leasehold, Reconciliation and NEC Project Teams.



The **Key Findings (KF)** from the review of this process are:

9. The Reconciliation Team send a daily list of DD transactions from the Direct Account to the Fraud Team to review. Lloyds has set up a 'block' on any new DD being set up against the Direct Account.
10. A monthly report providing total income figures from NEC is sent to the Reconciliation Team to be entered in to ICON, therefore, it is not possible to reconcile with the individual transactions on the imported bank statement. It is currently a manual process for uploading NEC data into ICON.
11. The DD Reconciliation process relies on the temporary NEC Implementation project team staff whose contract at SBC will be finishing soon. The processes they perform will need to be picked up by other staff.
12. The Reconciliation Team manually load in the bank statement transactions to ICON but if there isn't a valid payment reference the income is allocated to a Suspense Account until the Housing Team can provide a correct customer reference.

General

In addition to the key findings identified via documenting the DD end to end process the following **Key Findings (KF)** have been identified through the interview process:

13. The NEC reporting capability does not provide the management information trend analysis required to inform managers and leaders across Rent and Leasehold that income collection is improving or performing effectively e.g. arrears and debt write offs.
14. There is a lack of evidence that regular formal governance meetings are held with Housing and Finance to review income collection performance and with corrective action taken accordingly.
15. The plan for the ongoing support (training, ad hoc reporting, new requirements) to the NEC system and the teams using the system once the Implementation Team have finished has not been agreed.
16. There is no overall system map available to illustrate the data flows between the relevant systems: NEC, Paygate, BACS, ICON, MS Excel and Aggresso.
17. Direct Debit Instructions, Amendments, Cancellation and Return information is not stored in a way that can be accessed easily for each Customer.
18. Lack of a primary contact with access to the BACS portal rules and guidance to ensure SBC are compliant with the latest processes and procedures for operating the Direct Debit Scheme.
19. There is scope for a lack of clarity regarding roles and responsibilities and system ownership because the Rent team are in finance, Leasehold team are in Housing and the Project Team are in ICT.
20. The capability and capacity of staff is reduced due to high staff turnover, sickness and high numbers of temporary staff.
21. SBC Financial procedures are due for review and the Council's aims of the Debt Management Policy are not all being achieved in the context of Housing income collection e.g. To ensure performance in relation to debt recovery is regularly reported through the relevant management and governance structures of the Council.

Recommendations

Findings are exceptions-based and are designed to communicate key issues identified during this Internal Audit review, together with suggested actions for improvement. They are detailed below, together with details of the potential / theoretical risk (Assessed risk).

Recommendation	Addressing Key Findings	Actions
<p>Recommendation 1:</p> <p>Ensure there are clearly documented Direct Debit (DD) processes that are the basis for staff induction and refresher training within Housing income collection</p>	<p>KF1: Staff perform a manual check to ensure the payer bank account does not belong to SBC and that the name on the bank account is either a joint tenant or a family member listed on the account; this may not always happen because it relies on existing and new staff knowing or remembering to check.</p> <p>KF4: The BACS 'Input Report' provided by the Paygate portal provides information regarding any DD instructions that have been rejected by the Payer's PSP. This report will need to be manually actioned within the NEC System to cancel the DD.</p> <p>KF7: Notifications of DD amendments, cancellation or failure to collect is reported via the Paygate portal (ADDACS and ARUDD reports). This information needs to be manually actioned within the NEC system otherwise it will assume the payment has been successful and will present the same DD on the next payment cycle.</p> <p>KF21: SBC Financial procedures are due for review and the Council's aims of the Debt Management Policy are not all being achieved in the context of Housing income collection e.g. To ensure performance in relation to debt recovery is regularly reported through the relevant management and governance structures of the Council.</p>	<p>1.1 Review the NEC training material (relevant to DD) and identify where there are gaps in the documentation</p> <p>1.2 Amend the training material to address the identified gaps including the manual processes identified in the key findings</p> <p>1.3 Conduct a Training Needs Analysis of the staff delivering the DD processes to inform the design of the induction and refresher training</p> <p>1.4 Design the induction and refresher training and develop a rolling plan of delivery</p> <p>1.5 Deliver the induction and refresher training</p> <p>1.6 Consider whether there is a need for a wider review of the NEC training material i.e. outside of the DD processes</p> <p>1.7 Review and revise the SBC Financial procedures and Debt Management Policy.</p>

Recommendation	Addressing Key Findings	Actions
<p>Recommendation 2:</p> <p>Implement system and process improvements for Payer Verification within Housing income collection</p>	<p>KF2: SBC is responsible for verifying the bank account matches the payer’s name. The NEC system performs a ‘Modulus’ check which validates the sort code and account number are a valid combination. There is no verification carried out to confirm the payer’s name on the bank account matches the account number and sort code.</p> <p>KF6: At least some of the PSPs are not carrying out payer verification checks to ensure the information within the payment file (name, account number, sort code) match. This will lead to a failed collection where the money will be returned from SBC to the Payer.</p>	<p>2.1 Explore the cost and benefits of the different options available for SBC to deliver payer verification in Housing income collection</p> <p>2.2 Secure agreement through the appropriate SBC governance to implement the recommended option for payer verification</p> <p>2.3 Implement payer verification within Housing income collection</p> <p>2.4 Consider whether payer verification should be implemented in other service areas e.g. Council Tax.</p>

Recommendation	Addressing Key Findings	Actions
<p>Recommendation 3:</p> <p>Review the resource requirements, roles and responsibilities for Housing income collection and the NEC System and design and implement a service focused on delivering the end-to-end Direct Debit (DD) process</p>	<p>KF3: There is one SBC member of staff across Rent and Leasehold who has the access and capability to utilise the Paygate portal to submit the DD AUDISS setup file and to access the BACS Reports in the BACS system. This is a single point of failure for SBC.</p> <p>KF5: The DD Set Up process relies on the temporary NEC Implementation project team whose contract at SBC will be finishing soon. The processes they perform will need to be picked up by other staff.</p> <p>KF9: The Reconciliation Team send a daily list of DD transactions from the Direct Account to the Fraud Team to review. Lloyds has set up a 'block' on any new DD being set up against the Direct Account.</p> <p>KF11: The DD Reconciliation process relies on the temporary NEC Implementation project team staff whose contract at SBC will be finishing soon. The processes they perform will need to be picked up by other staff.</p> <p>KF15: The plan for the ongoing support (training, ad hoc reporting, new requirements) to the NEC system and the teams using the system once the Implementation Team have finished has not been agreed.</p> <p>KF18: Lack of a primary contact with access to the BACS portal rules and guidance to ensure SBC are compliant with the latest processes and procedures for operating the Direct Debit Scheme.</p> <p>KF19: There is scope for a lack of clarity regarding roles and responsibilities and system ownership because the Rent team are in finance, Leasehold team are in Housing and the Project Team are in ICT.</p> <p>KF20: The capability and capacity of staff is reduced due to high staff turnover, sickness and high numbers of temporary staff.</p>	<p>3.1 Agree the future design (Roles and Responsibilities) of the Housing Systems Team to replace the NEC Implementation project team</p> <p>3.2 Implement a smooth transition from the current NEC Implementation project team to the Housing Systems Team</p> <p>3.3 Review the Housing income collection processes and identify the activities that need to be handed over from the NEC Implementation project team to the service delivery teams</p> <p>3.4 Review the resource, roles and responsibilities for Housing income collection (Rent, Leasehold, Finance and DDaT) and determine whether the organisational design and process ownership could be improved</p> <p>3.5 Establish primary contact(s) for BACS who is/are responsible for keeping up to date on the rules, guidance and training for SBC</p> <p>3.6 Explore the root cause behind high staff turnover, sickness and high numbers of temporary staff in Housing income collection</p> <p>3.7 Implement a 'people plan' to deliver a stable permanent Housing income collection team.</p>

Recommendation	Addressing Key Findings	Actions
<p>Recommendation 4:</p> <p>Implement improvements in reporting and monitoring to inform effective Housing income collection governance meetings</p>	<p>KF8: There is no management information reported regarding the number of DD payments returned and the reason for the return. This information should be monitored to ensure updates to the DDs are actioned in a timely manner.</p> <p>KF13: The NEC reporting capability does not provide the management information trend analysis required to inform managers and leaders across Rent and Leasehold that income collection is improving or performing effectively e.g. arrears and debt write offs.</p> <p>KF14: There is a lack of evidence that regular formal governance meetings are held with Housing and Finance to review income collection performance and with corrective action taken accordingly.</p>	<p>4.1 Identify the source data and process for capturing and reporting DD return Management Information (MI)</p> <p>4.2 Implement a solution for reporting DD return MI</p> <p>4.3 Identify and develop with service managers and leaders the MI reports required from the NEC system for Housing income collection</p> <p>4.4 Identify and implement the capacity and capability to be able to develop ad hoc reporting from the NEC system</p> <p>4.5 Ensure the MI is produced in a timely manner to inform regular governance meetings for Housing income collection performance.</p>

Recommendation	Addressing Key Findings	Actions
<p>Recommendation 5:</p> <p>Investigate opportunities to improve manual Direct Debit (DD) processes to increase staff efficiency, accuracy of data and availability of information</p>	<p>KF4: The BACS 'Input Report' provided by the Paygate portal provides information regarding any DD instructions that have been rejected by the Payer's PSP. This report will need to be manually actioned within the NEC System to cancel the DD.</p> <p>KF7: Notifications of DD amendments, cancellation or failure to collect is reported via the Paygate portal (ADDACS and ARUDD reports). This information needs to be manually actioned within the NEC system otherwise it will assume the payment has been successful and will present the same DD on the next payment cycle.</p> <p>KF10: A monthly report providing total income figures from NEC is sent to the Reconciliation Team to be entered in to ICON, therefore, it is not possible to reconcile with the individual transactions on the imported bank statement. It is currently a manual process for uploading NEC data into ICON.</p> <p>KF12: The Reconciliation Team manually load in the bank statement transactions to ICON but if there isn't a valid payment reference the income is allocated to a Suspense Account until the Housing Team can provide a correct customer reference.</p> <p>KF16: There is no overall system map available to illustrate the data flows between the relevant systems: NEC, Paygate, BACS, ICON, MS Excel and Aggresso.</p> <p>KF17: Direct Debit Instructions, Amendments, Cancellation and Return information is not stored in a way that can be accessed easily for each Customer.</p>	<p>4.1 Explore the cost and benefits of automating the 'reports' from the Paygate portal into the NEC system to update the income collection information</p> <p>4.2 Secure agreement through the appropriate SBC governance to implement the preferred solution from 5.1</p> <p>4.3 Complete the implementation of the automation of the NEC data into ICON to enable more efficient and effective reconciliation</p> <p>4.4 Develop a system map that details the data flows between all relevant systems</p> <p>4.5 Explore the costs and benefits of storing all the income collection information including DD records at a customer level</p>

Is this a Housing specific or Council-wide Direct Debit issue?

Whilst the review has focused on Housing (Rent and Leasehold) Income Collection via Direct Debits (DD) this report has identified the following additional points for consideration by SBC:

- Council Tax and National Non-Domestic Rates (NNDR) collection via DD does **not** have Payer Verification
- Council Tax and National Non-Domestic Rates (NNDR) DD returns are **updated manually** into the Council IT system
- The Housing 'Major Works' DD processes were out of scope of this review
- If there are other Council services where DD is utilised at SBC, then it is likely that they too do not have Payer Verification and that DD returns are updated manually into the Council IT system.

Therefore, this report concludes the findings for Housing (Rent and Leasehold) Income DD Collection apply to other Council services and this is a Council-wide issue.

Recommendation 6: Conduct a review of the Direct Debit arrangements of other Council services in order to develop recommendations for improvement.

Is there further work required in other areas?

Whilst the review has focused on Housing (Rent and Leasehold) Income Collection via Direct Debits (DD) this report has identified the following additional salient points for consideration by SBC:

- *Paperless Direct Debit compliance:* SBC is not compliant with the BACS Service User rules for providing Paperless Direct Debit i.e. no payer verification. It is not clear whether SBC is meeting the remaining criteria for paperless Direct Debit which would have been agreed with their Sponsoring PSP (Lloyds).
- *Clarity on handling DD returns reconciliation:* The SBC Reconciliation and Treasury Teams are unclear how DD adjustments and unpaid DD are itemised within the Direct Bank Account which impacts the team's ability to ensure reconciliation is accurate.
- *Other Bank Accounts:* It is only the SBC Direct Bank Account that has been reviewed to highlight this fraudulent Direct Debit issue. SBC has 12 other bank accounts where this issue could occur.
- *Manual Payments:* The efficiency and effectiveness of processing manual payments from tenants is outside the scope of this review. There is a daily process between the Reconciliation Team and the Housing income collection team to verify the manual payments received.

Therefore, this report provides the following recommendations:

Recommendation 7: Conduct a review of current SBC DD practice compared with the BACS Paperless Direct Debit Service User rules and the criteria agreed with the Sponsoring PSP for Paperless Direct Debit.

Recommendation 8: Treasury and Reconciliation to engage with Lloyds to fully understand how DD adjustments and unpaid DD are itemised (credit and debit) within the bank account statement to ensure reconciliation is accurate.

Recommendation 9: Conduct a review of the other SBC bank accounts to ensure any Direct Debit payments leaving the account have been reconciled.

Recommendation 10: Conduct a review of the Manual Payments process in order to develop recommendations for improvement.

Annex 1: Distribution

Name	Role	Version	Date
Ian Kirby	Interim Head of Internal Audit & Counter-Fraud	V2.0	16 th June 2025
Annabel Scholes	Executive Director Finance & Commercial and S151 Officer	V2.0	16 th June 2025
Lisa Keating	Director of Housing	V2.0	16 th June 2025
Martin Chalmers	Director of Digital, Data and Technology	V2.0	16 th June 2025
Andy Jeffs	Director of Revenues and Welfare Services	V2.0	16 th June 2025

Annex 2: Interviews conducted

Ref.	Name	Role
1	Lisa Keating	Director of Housing
2	Angela Powell	Head of Home Ownership
3	Martin Chalmers	Director of Digital, Data and Technology
4	Claire McNab	Financial Investigator
5	Daria Grzybowski	Home Ownership Project Manager (Income Recovery) - Leasehold
6	Tom Clark	Interim Head of Revenues
7	Andrew Chidiku	Lead Auditor
8	Anna Dulias	Housing Recovery Lead - Rent
9	Jasvinder Dalvair	Team Leader for AC payable and receivable
10	Baljit Shari	HMS Project Manager
11	Alun Dowling	IT Project Manager and Implementation specialist
12	Patricia Gould-Charles	Reconciliation Team
13	Xing Rong	Treasury Manager
14	Tracy Corps / Elenor Paraskeva / Colin Watson	Application Support
15	Shujaat Khan	Senior Rent Accounts Officer
16	Kevin Smith	Reporting Lead
17	Sonya Mohal / Marta Piatek	Lloyds Bank – Sponsoring PSP

Annex 3: Documents reviewed

A significant number of documents were reviewed to inform these findings and recommendations.

A full list of the documents reviewed can be provided on request.



