



SOUTHWAY HOUSING TRUST

Damp and Mould Framework

Internal audit report: 7.22/23

Final

17 April 2023

This report is solely for the use of the persons to whom it is addressed.

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1. EXECUTIVE SUMMARY

With the use of secure portals for the transfer of information, and through electronic communication means, 100 per cent of our audit has been conducted remotely. Remote working has meant that we have been able to complete our audit and provide you with the assurances you require. Based on the information provided by you, we have been able to sample test, or undertake full population testing using data analytics tools, to complete the work in line with the agreed scope.

Why we completed this audit

In the past 6 months Registered Providers (RPs) of social housing have come under closer scrutiny of their responsibilities concerning Damp and Mould in their tenants' homes.

At Southway Housing Trust ('the Trust' or 'SHT'), the Strategic Director of Property and Development is primarily responsible for Damp and Mould in the Trust's properties and is supported by the Damp and Mould Steering Group. The Damp and Mould Steering Group, which was established on 6 June 2022 and headed by the Strategic Director of Property and Development, provides strategic direction for the management of Damp and Mould in the Trust properties, and is supported by the Damp and Mould Task Force Group which provides operational administration of the Damp and Mould process.

Tenants' reports related to Damp and Mould are received and recorded by the Customer Hub in the OpenHousing system, the Trust's integrated housing management system. The number of cases reported each day can vary depending on factors such as the age and condition of the property, the weather conditions, and the level of awareness of the tenants. Between 13 February 2023 and 10 March 2023, the Trust logged 135 reports of Damp and Mould cases in the OpenHousing system.

We have undertaken a review of the control framework surrounding the Trust's Damp and Mould process as part of the approved internal audit plan for 2022/23. The objective of the review was to provide the Parent Board with assurance that the controls in place to ensure consistent application of controls in terms of the Trust's responsibilities and accountability to the management of Damp and Mould cases in the Trust's tenanted properties.

Conclusion

Our review has confirmed that whilst the Trust has an embedded approach to managing Damp and Mould cases, we have identified four areas where improvements are needed to the control framework at a documentary / procedural level. These areas are in relation to the following:

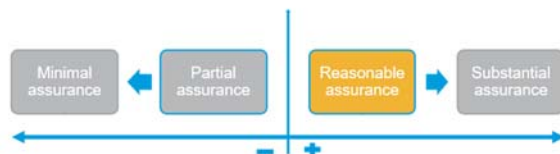
- The Interim Damp and Mould Policy should be updated with roles and responsibilities; and equality and diversity considerations;
- Furthermore, the updated Policy should be made available via the Trust's website;
- Operational procedure documents should also be updated with document control schedules;
- In addition, the Damp and Mould Process Flowchart timeline to attend Damp and Mould repair jobs should be aligned to 20 working days as with the current practice;
- A formal service level agreement (SLA) between the Trust and the contractor, Mouldex, should be finalised. This should also include reference to a data sharing agreement; and
- The Trust should define inspection appointment date timescales.

As a result, we have agreed on five 'Medium' and one 'Low' priority management actions. Details of the nine management actions agreed upon are included in section 2 below.

Internal audit opinion:

Taking account of the issues identified, the Parent Board can take reasonable assurance that the controls upon which the organisation relies to manage this area are suitably designed, consistently applied and effective.

However, we have identified issues that need to be addressed in order to ensure that the control framework is effective in managing the identified area.



Key findings

Our review identified the following key findings:



We noted that the Interim Damp and Mould Policy did not include sections for roles and responsibilities, and equality and diversity considerations. Furthermore, the Interim Policy is not available to stakeholders via the Trust's website. As such, there is a risk of lack of clarity as staff may not understand their roles and responsibility in the Damp and Mould management process, which may lead to ineffective actions and inefficiencies.



From our review of the Damp and Mould operational documents such as Damp and Mould Process Flowchart, Damp and Mould Standard Jobs Training Guide, Damp and Mould Script and Damp and Mould (Condensation) Prioritisation, we noted the following:

- There is no evidence to show who prepared, reviewed / approved the documents, nor whether the documents were within their review cycle; and
- There are discrepancies in relation to whom to assign Damp and Mould repair jobs base on the priorities in the Damp and Mould Process Flowchart and Damp and Mould (Condensation) Definitions Matrix documents, ie to the Trust or the contractor, Mouldex.

There is a risk that disparities in the documents may cause confusion and error in assigning responsibilities between the Trust and the contractor.



According to the Damp and Mould Process Flowchart, Damp and Mould repair jobs are to be completed within 20 days of been raised. However, we were informed by management that Damp and Mould repair jobs are completed within 20 working days. Therefore, there is a risk that disparities in the Damp and Mould Process Flowchart and current practice may cause confusion and error in assigning Damp and Mould repair jobs.



From our discussion with management, we noted that a service level agreement (SLA) is not in place with Mouldex. Whilst management noted one is in development, the Trust has been operating without a formal agreement in place. We were not informed of any issues between the Trust and Mouldex.



We noted that management has yet to define inspection appointment timescales. For our sample of 10 cases during the period 13 February 2023 to 10 March 2023, we noted that the Trust attended appointments between one day and 47 days between when a Damp and Mould case was logged and when the inspection appointment was scheduled. In three of these

cases, the time lag was between 38 and 47 days; and the average for our sample 20.78 days.

From the 135 Damp and Mould cases referred to the Trust during this period, the average time was 20.62 days.

This timeline does not reflect the sense of urgency to attend to Damp and Mould cases as observed in the sector.

Additional Findings

Our audit identified that the following controls are suitably designed, consistently applied, and are operating effectively:



Management have appointed an external contractor, Mouldex to review Damp and Mould cases. At the time of our review management were in the process of documenting a service level agreement (SLA) with Mouldex.

Management noted that the SLA would be in place for April 2023 and would be based on the interim timescales defined in the Mouldex Process and Timeframes document which the Trust and Mouldex are currently using to monitor timelines assigned to Damp and Mould repair jobs.



We noted that Mouldex has been involved in the Trust's Damp and Mould process as a specialist contractor and has been a part of the development of the Damp and Mould process and has been present through initial Damp and Mould Steering Group meetings.



The Trust has developed a Damp and Mould (Condensation) Definitions Matrix, which provides guidance on the priority to assign cases based on the risk matrix and description obtained from the tenant. The three priorities and responsibilities are detailed below:

- Priority one: Typically multiple areas exceeding 1m² each throughout the property. Any repair work is delivered by Mouldex on behalf of the Trust;
- Priority two: Typically various areas / patches up to 1m² each with addition of large area. Any repair work is delivered by Mouldex on behalf of the Trust; and

- Priority three: Various areas / patches of less than 0.5m² each. Any repair work is delivered by the Trust.

The Definitions Matrix was introduced on 13 February 2023 and used in conjunction with the Damp and Mould Script.



From our review of the Damp and Mould Script, we noted that the Script outlines a series of confirmatory questions asked by the Customer Hub Officer upon receiving a report from a tenant to gain insight into the nature of their case. The answers to the Script are logged and aid in determining the order of priority of the case.



From our review of the Damp and Mould Process Flowchart, we noted that it includes step-by-step graphical guidance for reporting Damp and Mould cases by the tenants and frontline officers, receiving and recording reports by Customer Hub, and the assignment of priorities to the case. This provides for clear guidance to all staff using the Script and clarity of message to tenants.



We confirmed that staff involved in Damp and Mould management had been trained on Damp and Mould through the review of course material and training schedule of attendance.

For a sample of 10 staff involved in Damp and Mould process including Customer Hub Officers (front line) and Operatives (Surveyors), we noted that in all cases staff attended the training as evidenced by the completion of an attendance schedule. The training includes Damp and Mould call centre training for Customer Hub Officers, Damp and Mould Level one and two training for Customer Hub Officers and operatives.

Furthermore, we noted that the Trust has received assurance from Mouldex that its staff have also been trained in Damp and Mould. This is an area where periodic assurance will be required by the Trust if not already planned for as a good practice suggestion.



From our review of the Trust's website, we noted the following:

- Information covering Condensation, Damp and Mould is detailed on the website, including information on the routes that can be used to contact the Trust;
- The Trust website had accessibility options that allow information on it to be read in 28 different languages, listened to in audio format and the font size can be amended to aid readability; and
- The quarterly newsletter titled 'Southway Stories December 2022' made reference to the actions tenants can take to deal with Damp and Mould.

Furthermore, a Condensation, Mould, and Damp leaflet has been developed, which contains abridged information on Condensation, Damp and Mould from the Trust's website. The leaflet is issued to tenants during site inspections to support the Surveyors' advice on Condensation, Damp and Mould prevention and treatment.



The Customer Hub Officer used OpenHousing to log all cases of Damp and Mould reports received from tenants against the tenants' properties. For the 135 Damp and Mould cases, 25 were assigned as priority three.

For a sample of 10 Damp and Mould cases received by the Trust during the period 13 February 2023 to 10 March 2023, we confirmed the following:



- In 9 / 10 cases, the appointments were scheduled with the tenant for inspection; and
- In the remaining case, an inspection had been logged with no appointment date. From our discussion with management, we were informed that the appointments predated the introduction of the process of case prioritisation; hence, no inspection appointment date was recorded. However, we noted that a follow-on work for this case had been logged and completed.

For a sample of 10 Damp and Mould cases, we confirmed the following:



- In 3 / 10 cases, the inspection appointment had been completed and a follow-up job had been raised in OpenHousing;
- In 2 / 10 cases, the tenant refused further work or cancelled the inspection appointment; and
- For the remaining 5 / 10 cases, the inspection appointment had been scheduled to take place after our review in April 2023.

For our sample of 10 completed Damp and Mould repair jobs, we noted the following:



- In 6 / 10 cases, there was evidence of work and the material sheet having been completed by the contractor and signed off by the tenant to show that the Damp and Mould repair job was completed; and
- In 4 / 10 four cases, we noted that the job was completed by the Trust and therefore a job completion certificate is not required, as the details of the jobs are captured directly into OpenHousing.



The Trust has established a Damp and Mould Taskforce Group. We noted that the Group was constituted on 21 February 2023, and its members include the following:

- The Head of Assets and Environment;
- The Contracts Manager;
- The Repairs Manager;
- The Neighbourhood Manager;
- The Damp and Mould Co-ordinator;
- The Communications Officer;
- The Business Information Manager; and
- The Customer Hub Manager.

The Group meets weekly and has responsibilities primarily focused on the operational review of Damp and Mould cases in the Trust's properties. The Taskforce Group reports to the Damp and Mould Steering Group.



The Trust has also established Damp and Mould Steering Group. We noted that the Group was constituted on 6 June 2022, and its chair is the Strategic Director Property and Development.

The Group meets monthly and has the responsibilities primarily focus on the improving the Damp and Mould processes, knowledge, and communication in the Trust.



We noted evidence of reporting Damp and Mould issues through the Trust's governance structure:

- Through quarterly performance reports (Q2 and Q3), the Strategic Director of Property and Development provided an update on Damp and Mould to the People and Place Committee at their 8 November 2022 and 7 February 2023 meetings; and
- At the Parent Board meetings of 28 June 2022 and 6 December 2022, the Strategic Director of Property and Development presented reports on Asset Management Strategy 2022 - 2025 and Approach to Damp and Mould, respectively.

These reports detailed the Trust's approach to dealing with Damp and Mould and also provided updates on Damp and Mould in the Trust's properties.

Good practice

We identified the following areas of good practice demonstrated by the Trust:



The Trust uses ResponseEye as a diagnostic tool for assessing Damp and Mould cases reported by tenants during a call to the Customer Hub.

ResponseEye enables a tenant with a smartphone to stream live footage directly from their telephone's camera to the Customer Hub, thus providing vital live footage to identify and categorise Damp and Mould cases. Due to the enhanced efficiency, we have identified this as an area of good practice that the Trust utilises, which we do not consistently see in similar organisations across our client base.

2. DETAILED FINDINGS AND ACTIONS

This report has been prepared by exception. Therefore, we have included in this section, only those areas of weakness in control or examples of lapses in control identified from our testing and not the outcome of all internal audit testing undertaken.

Area: Policies and procedures				
Control 1	The Trust has documented an Interim Damp and Mould Policy which details the Trust's approach to managing reported cases of Damp and Mould including Condensation. The Interim Policy was approved the Parent Board on its meeting on 6 December 2022.		Assessment:	
			Design	✓
			Compliance	Partial
Findings / Implications	From our review of the Interim Damp and Mould Policy we noted that it included details of the Trust approach to dealing with report cases of Condensation, Damp and Mould in the Trust properties. However, we noted that the Interim Policy did not include sections for roles and responsibilities. Furthermore, given that Damp and Mould cases can affect various individuals and communities, the Policy did not refer to the Trust's equality and diversity considerations. In addition, we reviewed the Corporate Policies and Documents section of the Trust's website and noted that the Interim Policy is not available to stakeholders via the Trust's website. There is a risk that the public, including the Trust's tenants, do not have access to the Interim Policy; consequently, they may not be aware of the Trust's approach to managing Damp and Mould. There is a risk of lack of clarity as staff may not understand their roles and may not provide staff with a comprehensive link to the Damp and Mould operational guidance documents, which can lead to ineffective actions and inefficiencies. Also, there is a risk that some individuals and communities may not be treated fairly, as the Trust has not indicated its commitment to ensuring that the Policy is sensitive to the diverse needs of individuals and communities using its properties.			
Management Action 1	Management will review and update the Interim Damp and Mould Policy to include the following sections: • Roles and responsibilities; and • Equality and diversity considerations. Upon finalising the Damp and Mould Policy, management will obtain approval from the Parent Board.	Responsible owner:	Date:	Priority:
		Matt Roberts, Strategic Director Property and Development	31 May 2023	Medium

Area: Policies and procedures

Follow Up Evidence	A copy of the updated Damp and Mould Policy that includes roles and responsibilities and equality and diversity considerations.			
Management Action 2	Management will ensure that the final Damp and Mould Policy is uploaded to the Corporate Policies and Documents section of the Trust website.	Responsible owner: Matthew Maouati, Head of Corporate Services	Date: Completed	Priority: Medium
Follow Up Evidence	Screenshots from the Trust's website to confirm that the Damp and Mould Policy has been uploaded to the Corporate Policies and Documents section of its website.			

Area: Policies and procedures

Control 2	The Trust has documented various operational guidance documents for its Damp and Mould process, including: • The Damp and Mould Process Flowchart (introduced 13 February 2023); • The Damp and Mould Standard Jobs Training Guide; • The Damp and Mould Script (introduced 13 February 2023); and • The Damp and Mould (Condensation) Definitions Matrix. Also, these documents are available on the intranet for staff.	Assessment: Design ✓ Compliance Partial
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Findings / Implications	From our review of the operational guidance documents, we noted the following: • There is no evidence to show who prepared, reviewed / approved the documents, nor whether they were within their review cycle; and • There are discrepancies in the Damp and Mould Process Flowchart and Damp and Mould (Condensation) Definitions Matrix documents. According to the Process Flowchart priority two or three cases are assigned to Mouldex. However, according to the Definitions Matrix one and two cases are assigned (delivered) by the Mouldex. In addition, it is not clearly stated who is responsible for completing priority one cases in the Process Flowchart. There is a risk that changes to documents are not adequately tracked which can result in application of actions which are not relevant to the current business environment. Also, there is a risk that disparities in the documents may cause confusion and error in assigning responsibilities between the Trust and the contractor.
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Management Action 3	Management will ensure that the following operational guidance documents: • The Damp and Mould Process Flowchart; • The Damp and Mould Standard Jobs Training Guide; • The Damp and Mould Script; and • The Damp and Mould (Condensation) Definitions Matrix are reviewed and updated with document control information to enable tracking of changes to the documents. The document control details will include the following: • Who prepared each document; • Who reviewed and approved each document; • The date each document was reviewed and approved; and • Next review cycle. In addition, the Damp and Mould Process Flowchart will be updated to reference Damp and Mould repair jobs are reviewed within 20 working days.	Responsible owner: Brian Morrissey, Head of Assets and Environment / Louise Dunsdon, Business Transformation Manager	Date: 30 June 2023	Priority: Medium
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Area: Policies and procedures

Follow Up Evidence	Document control information incorporated in the following operational guidance documents: • The Damp and Mould Process Flowchart; • The Damp and Mould Standard Jobs Training Guide; • The Damp and Mould Script; and • The Damp and Mould (Condensation) Definitions Matrix.			
Management Action 4	Management will ensure that the discrepancies in Damp and Mould Process Flowchart and Damp and Mould (Condensation) Definitions Matrix Damp and Mould priorities are reviewed to align with each other.	Responsible owner: Brian Morrissey, Head of Assets and Environment / Louise Dunsdon, Business Transformation Manager	Date: 30 June 2023	Priority: Medium
Follow Up Evidence	A copy of the updated Damp and Mould Process Flowchart and Damp and Mould (Condensation) Definitions Matrix.			

Area: Damp and Mould Contractor service level agreement (SLA)

Control 3	The Trust is currently developing a service level agreement (SLA) with Damp and Mould contractor (Mouldex) based on Mouldex Process and Timeframes document timescales. The SLA will outline the Trust and the contractor's roles and responsibilities in the operational management of Damp and Mould in the Trust properties.	Assessment:	
		Design	Partial
		Compliance	Partial

Findings / Implications	From our discussion with management on 17 March 2023, we were informed that management is in the process of documenting a service level agreement (SLA) with its Damp and Mould contractor (Mouldex). Management noted that the SLA would be in place for April 2023 and would be based on the interim timescales defined in the Mouldex Process and Timeframes document which the Trust and Mouldex are currently using to monitor timelines assigned to Damp and Mould repair jobs, which may be subject to change following finalising the SLA. Our audit was delivered prior to April 2023.
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In terms of the contractor being aware of their roles and responsibilities, management noted that Mouldex had been involved in the Trust's Damp and Mould process as a specialist and has been a part of the development of the Damp and Mould process and has been present through Damp and Mould Steering Group meetings.

As planned, the finalisation of the SLA will assist with the consistency in approach and an agreed-upon standard of performance for Mouldex or responsibilities expected the Trust to perform. We also noted there is no data sharing agreement between the Trust and Mouldex on using sensitive information of the tenants to attend Damp and Mould inspections / repair jobs.

Management Action 5	Management will formally approve the service level agreement (SLA) with Mouldex, which will include the following but not be limited to: • Service description; • Performance metrics; • Reporting; • Change management; and • Termination. The SLA will also include the Trust's data-sharing agreement principles based on relevant regulations and legislation, including the following but not be limited to: • Use restrictions; • Data security and	Responsible owner: Brian Morrissey, Head of Assets and Environment	Date: 31 May 2023	Priority: Low
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Area: Damp and Mould Contractor service level agreement (SLA)

- Data privacy.

**Follow Up
Evidence**

A copy of approved SLA with Mouldex.

Area: Damp and Mould inspection and repair jobs

Control 4	Once the case has been logged in OpenHousing by the Customer Hub Officer, a Surveyor is scheduled to visit the tenant to determine a Damp and Mould repair job is required.	Assessment:		
		Design	✓	
		Compliance	Partial	
Findings / Implications	From a walkthrough of the Damp and Mould inspection, we noted that once a case has been logged in OpenHousing, an inspection is scheduled with the tenant. Where the inspection is confirmed to be a Damp and Mould case, the Surveyor either tries to treat it during the visit or the Surveyor will have a Damp and Mould repair job raised for another visit.			
	For a sample of 10 inspections selected from Damp and Mould inspections extract, we noted the following:			
	In 9 / 10 cases, the appointments were scheduled with the tenant for inspection. In the remaining case, an inspection had been logged with no appointment date. From our discussion with management, we were informed that for the one appointment it predated the introduction of the process of case prioritisation; hence, no inspection appointment date was recorded. However, we noted that a follow-on work for this case had been logged and completed.			
	From our review, we noted that management has yet to define inspection appointment date timescales. Also, from the review of the time lag between when a Damp and Mould case being reported and when the inspection appointment, we noted the following:			
	- The time lag for the nine inspections in our sample ranged from one to 47 days. In three of these cases, the time lag was between 38 and 47 days; - The average time for an inspection appointment for our sample 20.78 days; and - From the 135 Damp and Mould cases referred to the Trust for the period 13 February 2023 to 10 March 2023, the average time 20.62 days.			
	Given that Damp and Mould issues are a major concern in the sector, it will be beneficial for management to define a timescale for inspection appointments. This approach will reflect the sense of transparency and urgency to complete Damp and Mould inspections and treatment and enhance the accountability of the Trust operatives and contractors on their responsibilities in Damp and Mould management.			
Management Action 6	Management will define the timescale for attending inspection appointments. These timescale will be agreed upon with the contractor and used to monitor the performance against scheduled Damp and Mould inspection appointments.	Responsible owner: Brian Morrissey, Head of Assets and Environment	Date: 3 ^{1st} May 2023	Priority: Medium

Area: Damp and Mould inspection and repair jobs

Follow Up Evidence	Evidence that management has defined a timescale for attending Damp and Mould inspection appointments. For a sample of Damp and Mould inspection appointments, there is evidence that the appointments have been attended within the agreed KPI and timescale.
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Area: Damp and Mould inspection and repair jobs

Control 5	The Damp and Mould repair jobs instructions are sent to Mouldex by the Customer Hub or the Surveyor for completion within 20 days. Where this is not achieved, the Repairs Chase Team investigate the case.	Assessment:	
		Design	✓
		Compliance	Partial
Findings / Implications	For our sample of 10 Damp and Mould repair jobs scheduled between 13 February 2023 to 10 March 2023, we noted a case where a Damp and Mould repair work had been logged for 28 days. The Head of Asset and Environment explained that the case was logged in OpenHousing are based on working days and the appointment date was based on calendar days. Therefore, the job which was raised on 15 February 2023 and attended on 15 March 2023 and was within 20 working days. Whilst we noted the explanation by the Head of Asset and Environment, we confirmed that the Damp and Mould Process Flowchart states the following ' <i>If a D&M ticket is not complete in 20 days a work item is sent to the Repairs Chase Team to investigate. (Work Queue).</i> ' As such, the Damp and Mould Process Flowchart did not specifically reference 20 working days as the timeline for attending a Damp and Mould repair jobs. Therefore, there is a risk that disparities in the Damp and Mould Process Flowchart and current practice may cause confusion and error in assigning Damp and Mould repair jobs.		
Management Action	See management action 2 above.		

APPENDIX A: CATEGORISATION OF FINDINGS

The following table highlights the number and categories of management actions made as a result of this audit.

Area	Control design not effective*	Non Compliance with controls*	Agreed actions		
			Low	Medium	High
Policies and procedures	0 (5)	4 (5)	0	4	0
Damp and Mould Contractor service level agreement (SLA)	0 (1)	1 (1)	1	0	0
Communication to tenants	0 (1)	0 (1)	0	0	0
Staff and contractor agreement / training	0 (3)	0 (3)	0	0	0
Damp and Mould recording	0 (1)	0 (1)	0	0	0
Damp and Mould inspection and repair jobs	0 (5)	1 (5)	0	1	0
Damp and Mould operational reporting	0 (2)	0 (2)	0	0	0
Damp and Mould governance reporting	0 (2)	0 (2)	0	0	0
Total			1	5	0

* Shows the number of controls not adequately designed or not complied with. The number in brackets represents the total number of controls reviewed in this area.

APPENDIX B: SCOPE

The scope below is a copy of the original document issued.

Scope of the review

The internal audit assignment has been scoped to provide assurance on how Southway Housing Trust ('the Trust' or 'SHT') manages the following area:

Objective of the area under review

Registered Housing Providers ("RPs") are to come under greater scrutiny to demonstrate they are combating the presence of damp and mould ("D&M") in their tenanted buildings. D&M is to be emphasised moving forward as much a H&S issue as it is a disrepair issue and RP's need to be able to robustly demonstrate their responsibilities and accountability.

When planning the audit, the following areas for consideration and limitations were agreed:

- That there is an approved Policy and supporting Procedure in relation to D&M that has clear timeframes for review and approval;
- Ensure that general information about the detection and prevention of D&M is provided to tenants;
- Furthermore, to ensure that there are processes in place to ensure that tenants know how to report repairs and request inspections (specifically in relation to D&M);
- Training has been delivered (and is refreshed) to relevant staff (and contractors) that work across the Trust in relation to D&M. There is evidence in place to ensure that key staff (including contractors) have completed the relevant training;
- To understand how the information about D&M is collected, collated and recorded; and
- To consider the process and timeframes to respond to the requests reported, and potentially set defined periods / KPIs for response, and / or advice to be given to the tenants, and the reasonable steps to remediate or repair.

The following limitations apply to the scope of our work:

- The scope of the work is limited to those areas examined and reported upon in the areas for consideration in the context of the objectives set out for this review;
- Conclusions are based on our assessments made through discussions with management, assessment of the current framework of controls and review of relevant documentation made available;
- We will not comment on whether the procedures incorporate the most up to date legislation, only that processes exist to identify and incorporate any changes;
- The review is not intended to replicate or predict the outcome of a regulatory inspection;

- The results of our work are reliant on the quality and completeness of the information provided to us;
- This review will not visit any buildings to physically verify the details included within relevant systems;
- We will not provide an opinion on whether the Trust complies with Health and Safety legislation;
- Our audit does not provide any assurance with regards to compliance with Health and Safety legislation and other HSE requirements, and does not replicate the advice provided by Health and Safety Consultants;
- This audit does not replace the requirement for any of the external / independent inspections required by law;
- We will not comment on whether the procedures incorporate the most up to date legislation, only that processes exist to identify and incorporate any changes;
- We will not comment on the appropriateness of actions undertaken regarding non-compliance, only that they were identified and reported;
- We will not confirm that all regulatory requirements of the Trust have been identified for all properties;
- We will not provide assurance that building records are complete or re-perform any reconciliations of the records held;
- We will not comment on the completeness of the risk assessments / safety checks or actions identified as part of this;
- We will not comment on the skills and qualifications of the inspectors;
- We will not comment on the sufficiency of actions taken to address the findings of checks;
- We will not confirm that all records are complete and all required Risk Assessments / Safety Checks have been identified and completed;
- Testing will be limited and on a sample basis;
- The review will focus on controls in place at the Trust only;
- The review will not review and / or provide assurance in relation to the configuration of any IT systems linked to D&M; and
- This audit does not replace the requirement for any of the external / independent inspections required by law;

Our work does not provide absolute assurance that material errors, loss or fraud do not exist.

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The matters raised in this report are only those which came to our attention during the course of our review and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. Actions for improvements should be assessed by you for their full impact. This report, or our work, should not be taken as a substitute for management's responsibilities for the application of sound commercial practices. We emphasise that the responsibility for a sound system of internal controls rests with management and our work should not be relied upon to identify all strengths and weaknesses that may exist. Neither should our work be relied upon to identify all circumstances of fraud and irregularity should there be any.

Our report is prepared solely for the confidential use of Southway Housing Trust, and solely for the purposes set out herein. This report should not therefore be regarded as suitable to be used or relied on by any other party wishing to acquire any rights from RSM UK Risk Assurance Services LLP for any purpose or in any context. Any third party which obtains access to this report or a copy and chooses to rely on it (or any part of it) will do so at its own risk. To the fullest extent permitted by law, RSM UK Risk Assurance Services LLP will accept no responsibility or liability in respect of this report to any other party and shall not be liable for any loss, damage or expense of whatsoever nature which is caused by any person's reliance on representations in this report.

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