

## Final Internal Audit Report 2010/11

# London Borough of Hammersmith and Fulham Single Equality Scheme May 2011


This report has been prepared on the basis of the limitations set out on page 14

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| <b>Introduction</b> | <p>As part of the 2010/11 Internal Audit Plan, agreed by the Audit Committee on 23 March 2010, we have undertaken an internal audit of the Council's Single Equality Scheme.</p> <p>This report sets out our findings from the internal audit and raises recommendations to address areas of control weakness and / or potential areas of improvement.</p> <p>The agreed objective and scope of our work is set out in the Audit Brief issued on 22 November 2010.</p> |
|---------------------|--|

| Audit Opinion & Direction of Travel | None | Limited  | Substantial | Full |
|-------------------------------------|------|--|-------------|------|
|                                     |      |  |             |      |

| Key Findings   | Key Statistics & Benchmarking   |
|--|---|
| <ul style="list-style-type: none"> <li>• The Single Equality Scheme was approved by Councillors in June 2010;</li> <li>• A formal framework for monitoring the receipt, review and approval of EIAs does not appear to be in place;</li> <li>• From a sample of 18 EIAs past their scheduled completion date, only four completed assessments were provided;</li> <li>• From a sample of 17 actions selected from the SES, six were assessed as being implemented, seven as partly implemented and four as not implemented; and</li> <li>• A number of actions on the SES were not SMART (Specific, Measureable, Achievable, Relevant and Time bound) and therefore it was not always possible to confirm implementation.</li> </ul> | <ul style="list-style-type: none"> <li>• LBHF has the third highest population density in England and Wales;</li> <li>• LBHF is the third smallest borough in London by area at 6.3 square miles;</li> <li>• Almost 25% of residents are of Black or Asian ethnic origin, and 5% are of Irish origin;</li> <li>• The Borough's school children speak approximately 98 languages; and</li> <li>• Almost 15% of residents are disabled people.</li> </ul> |

| Area of Scope  | Adequacy of Controls | Effectiveness of Controls | Recommendations Raised |            |            |
|--|----------------------|---------------------------|------------------------|------------|------------|
|  |                      |                           | Priority 1             | Priority 2 | Priority 3 |
| Monitoring and Reporting Implementation  |                      |                           | 1                      | 0          | 0          |
| Content of Single Equality Scheme  |                      |                           | *                      | 0          | 0          |
| Completion of Equality Impact Assessments (EIAs)                                     |                      |                           | *                      | 0          | 0          |
| Implementation of Single Equality Scheme Actions                                     |                      |                           | *                      | 0          | 0          |
| * The recommendation raised in Area 1 relates to weaknesses identified in this area. |                      |                           |                        |            |            |

Please refer to the attached documents for a definition of the audit opinions, direction of travel, adequacy and effectiveness assessments and recommendation priorities.

## Summary of Findings

### Monitoring and Reporting Implementation

The Opportunities Manager is the central officer responsible for monitoring the implementation of the Single Equality Scheme (SES) across the Council. At present, monitoring is undertaken in an informal manner using emails and telephone calls to contact relevant officers responsible for both the completion of Equality Impact Assessments (EIAs) and SES actions. Progress is not centrally documented. There is no record of progress or evidential checks being undertaken to confirm the completion of EIAs and implementation of actions.

Bi-monthly meetings are held by the Opportunities Working Group (OWG), which consist of a cross section of staff from across the Council (nominated by Directors). The OWG is responsible for monitoring the implementation and progress of the SES as well as promoting equality and diversity across the Council.

The roles, reporting lines and division of responsibility between the Opportunities Manager and the OWG for monitoring the implementation of SES actions and completion of EIAs do not appear to be clear.

Reports are made to Council Members on an annual basis, with the last report being made in June 2010.

### Content of Single Equality Scheme

The main requirements of the Equality Act are referred to in Appendix Two of the Council's Single Equality Scheme. We were informed that these had been reviewed by the Legal department at the Council. As part of our walkthrough, we identified that the legal content and updates relating to the SES are discussed by the officers at the OWG meetings.

The aims and target of the Scheme are linked to the proposed actions in the descriptive body of the SES using the action numbers as references. Although the actions have been defined and linked to the aims of the SES, these are not formally reviewed at OWG level on an ongoing basis and reported accordingly. As a result, changes to aims or implementation status are not recorded centrally.

### Completion of Equality Impact Assessment

Links to online learning/training for the completion of EIAs have been emailed to relevant officers across the Council. Although the Service Area Leads have been informed of the expectations regarding their completion of EIAs, there appears to be a lack of understanding on what is required to be completed and the deadlines for completion. Where decisions have been made by service areas to alter deadlines for the completion of EIAs, these have not been communicated to either the OWG or the Opportunities Manager for approval.

A sample of 18 EIAs which were due to have been completed was selected from Appendix 3 of the SES and lead officers were contacted to provide evidence of their completed up to date EIAs. From the sample of 18 EIAs selected:

- Four completed EIAs were provided. Of these four cases, two were completed using the new EIA pro-forma, two were submitted in the PEIA format and one was in draft form. Only one had been signed and dated by the Opportunities Manager;
- In seven cases officers stated that the deadline had been extended but there was no evidence of approval of this extension;

- Two had not been completed; and
- No response was received for the remaining five cases.

#### **Implementation of Single Equality Scheme (SES) Actions**

A sample of 17 service area actions was selected from the 116 listed actions across the Council. The sample was selected from each of the main departments across the Council in order to check the implementation status of their actions. It was identified that a number of the actions included in the SES did not appear to be realistic or implementation was not clearly measurable. For example, Action 64 states that the Council should 'Provide extra orange recycling bags to elderly and disabled people'. Discussion with the Recycling Manager identified that the elderly do not use greater amounts of waste and would therefore not require additional bags. Very few occasions arose where additional bags had been given.

Of the 17 SES action points selected:

- Four were assessed as being implemented;
- Nine were assessed as partly implemented; and
- Four were assessed as not implemented. Of these four not implemented, one action point has been cancelled due to the removal of funding, another was delayed and there were no responses from the remaining two.

We also observed that there is a tendency for the implementation status to be noted as 'ongoing'. In order for action to be measured, a timeframe should be set and objectives should be SMART (Specific, Measureable, Achievable, Relevant and Time bound).

Following our audit fieldwork, it was identified by the Head of Councillor's Services that a number of EIAs in support of Cabinet reports had not been produced despite the report indicating that an EIA had been produced. This issue was rectified before the meeting. Although this area was not covered by the scope of this audit, we would recommend that the system associated with producing EIAs in support of Cabinet reports is also reviewed to gain assurance that it is operating effectively.

#### **Acknowledgement**

We would like to thank the management and staff from the service areas contacted for their time and co-operation during the course of the internal audit.

## 1. Formal Framework for SES Management and Implementation

| Priority                   | Issue  | Risk   | Recommendation  |                     |          |  |  |
|----------------------------|--|--|---|---------------------|----------|--|--|
| 1                          | <p>A formal framework for monitoring the completion of EIAs and implementation of SES actions was not in place and roles and responsibilities were not clearly defined.</p> <p>From a sample of 18 EIAs past their scheduled completion date only four completed EIAs were provided.</p> <p>From a sample of 17 actions selected from the SES, four were assessed as being implemented, nine as partly implemented and four as not implemented. In addition, a number of actions examined were not SMART (Specific, Measureable, Achievable, Relevant and Time bound).</p> <p>Details of our testing can be found in Appendix B and C.</p> | <p>Where a formal framework for the monitoring and review of EIAs and SES actions is not in place, there is a risk that:</p> <ul style="list-style-type: none"> <li>• Staff will not be aware of their responsibilities and key tasks may not be completed to a satisfactory standard by the required deadline; and</li> <li>• Information reported to senior management and Council members may be incomplete or inaccurate leading to incorrect decisions being made.</li> </ul> <p>This may lead to the Council failing to comply, or being unable to demonstrate compliance with, the Equality Act 2010.</p> | <p>A framework by which the Council's Single Equality Scheme will be managed should be formally agreed and documented.</p> <p>Recommended key features of such a framework are defined in Appendix A.</p> |                     |          |  |  |
| <b>Management Response</b> |  |  | <table border="1"> <thead> <tr> <th>Responsible Officer</th> <th>Deadline</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>  | Responsible Officer | Deadline |  |  |
| Responsible Officer        | Deadline   |  |   |                     |          |  |  |
|                            |  |  |   |                     |          |  |  |

Agreed. We propose the following:

1. Opportunities Manager sets up formal framework for monitoring the receipt, review and advice given on EIAs conducted as part of business as usual in decision making
2. Opportunities Manager works with OWG to conduct one more full audit of SES actions, DES actions, and SES EIA Schedule, in order to capture a picture of progress six months ahead of ahead of all information being required for CMB GOV 2012, when these will be the subject of a final report on the SES and DES

We would welcome a follow up in six months time to review the adequacy and effectiveness of the new framework. This follow up audit will also help to inform preparations for CMB GOV in 2012 and inform our requirement to set Equality Objective(s) as per the public sector equality duty.

Opportunities Manager

30/09/2011

Opportunities Manager

30/09/2012

## Appendix A: Desired features of a SES Management Framework

Desired features that could facilitate the management and implementation of the SES are shown in the table below.

| Reference | Desired Features   |
|-----------|--|
| 1         | <p><b>Formal Agreement on the Importance of completing EIAs</b></p> <ul style="list-style-type: none"> <li>• A statement of importance should be produced defining the importance given to the Single Equality Scheme by the Council. The system implemented should then reflect the importance placed on the completion of EIAs and actions included in the SES.</li> </ul>   |
| 2         | <p><b>Definition of Roles and Responsibilities</b></p> <ul style="list-style-type: none"> <li>• Responsibility for completing, monitoring and collating EIAs and SES action points should be formally defined, documented and communicated to all relevant officers. Responsibilities defined should include but not be limited to: <ul style="list-style-type: none"> <li>○ Members of the Council;</li> <li>○ Directors and their departments;</li> <li>○ The Equalities Manager;</li> <li>○ The Opportunities Working Group;</li> <li>○ Committee Services; and</li> <li>○ Heads of Service.</li> </ul> </li> <li>• One officer should be allocated responsibility for collating information and reporting to Council Members.</li> <li>• Where tasks are delegated to individuals or groups, this should be clearly defined and communicated.</li> </ul> |



| Reference | Desired Features   |
|-----------|--|
| 4         | <p data-bbox="293 260 658 300"><b>Monitoring and Reporting</b></p> <ul data-bbox="293 323 2098 675" style="list-style-type: none"> <li data-bbox="293 323 1794 355">• A record of all EIAs, SES actions and their respective deadlines and responsible officers should be maintained;</li> <li data-bbox="293 371 2098 443">• Progress in the achievement of each department's SES action points and completion of EIAs should be centrally monitored against agreed deadlines and the central record updated. Where practical, progress checks should be supported by evidence;</li> <li data-bbox="293 459 2098 531">• Progress updates should then be reported to senior management periodically based around key reporting deadlines. These reporting dates should be built into a monitoring timetable;</li> <li data-bbox="293 547 2098 619">• A defined route of escalation, including timescales, should be established to deal with failure to submit EIAs or implement actions by the required deadline;</li> <li data-bbox="293 635 1957 667">• Any changes to actions, implementation dates or submission deadlines should be formally approved by a nominated officer.</li> </ul> |
| 5         | <p data-bbox="293 691 577 730"><b>Review and Sign off</b></p> <ul data-bbox="293 754 2098 879" style="list-style-type: none"> <li data-bbox="293 754 2098 818">• SES action points should be reviewed to help ensure that they are SMART (Specific, Measureable, Achievable, Relevant and Time bound).</li> <li data-bbox="293 818 2098 879">• EIAs should be signed and dated as evidence of review and approval by the responsible officer and the officer responsible for central review and approval. These approved assessments should be retained.</li> </ul>  |

## Appendix B – Summary of test findings – Completion of EIAs

A sample of 18 EIAs was selected from Appendix 3 of the SES that were past their completion deadline. The responsible officer was contacted to provide a copy of the EIA. The results of our testing are detailed in the table below:

| EIA Area                                       | EIA Completed | Comments   |
|--|---------------|--|
| Community Safety                               | No            | No response  |
| Family ASSIST                                  | No            | We were informed that deadline has been extended         |
| Commissioning - Mental Health                  | No            | No response  |
| Asylum Unaccompanied Minors                    | No            | Unable to contact responsible officer                    |
| Planning – Policy                              | Yes           | EIA complete but still in draft form                     |
| HR Policies and Procedures                     | Yes           | EIA complete   |
| Extended Services                              | Yes           | PEIA complete  |
| Integrated Youth Services                      | No            | We were informed that deadline has been extended         |
| Safeguarding and quality assurance unit        | No            | Not completed - 'work in progress'                       |
| Commissioning - Learning Disabilities Services | No            | We were informed that deadline has been extended         |
| Commissioning - Carers Services                | Yes           | PEIA completed but not reviewed by Opportunities Manager |
| Procurement                                    | No            | No response  |
| Housing Allocation Scheme                      | No            | We were informed that deadline has been extended         |
| Housing Advice, Information & Assessment       | No            | We were informed that deadline has been extended         |
| Enhanced Housing Options                       | No            | We were informed that deadline has been extended         |
| Area Regeneration                              | No            | No response  |
| Social Work Including Assessment and AMHPs     | No            | We were informed that deadline has been extended         |
| Contact and Assessment                         | No            | Not completed - 'work in progress'                       |

## Appendix C – Summary of Findings – SES Action Implementation

A sample of 17 actions was selected from Appendix 1 of the SES that were past their implementation deadline. The responsible officer was contacted to obtain evidence of implementation. The results of our testing are detailed in the table below:

| Action Number | Aim   | Target   | Timescale  | Lead Officer              | Reported Progress in SES June 2010  | Implementation Status |
|---------------|---|--|--|---------------------------|---|-----------------------|
| 1             | Delivery of a Local Information System (LIS) to create a single portal for sharing information containing contextual, strategic and statistical information on the borough, its public services and their users. The LIS will be based within the LBHF website and fully publicly accessible. The project will migrate and consolidate a large amount of existing information, much of which is already in the public realm and held in lbhf.gov.uk pages. Data providers will be assigned the task of managing and updating certain links and pages. | Complete mapping of strategies, data sets and existing performance information.<br>Agree additional content from consultation with CRAIG members.<br>Approve new structure for Tridion content.<br>Agree content ownership and updating process.<br>Migrate content to new pages.<br>Complete list and metadata for new content.<br>Manage and update content. | October 09<br>November 09<br>November 09<br>December 09<br>January 10<br>February 10 | FCS<br>Communications     | Project is underway and is currently mapping strategies, datasets and existing information. | PARTLY IMPLEMENTED    |
| 6             | The council can demonstrate equalities improvements and outcomes as a result of the SES and enhanced PEIA process   | Progress against the SES is monitored and resources are allocated to deliver them  | Ongoing  | Relevant Lead for the SES | Regular reports to Better Government Panel; annual report produced                          | PARTLY IMPLEMENTED    |

| Action Number | Aim   | Target   | Timescale           | Lead Officer   | Reported Progress in SES June 2010                 | Implementation Status       |
|---------------|---|--|---------------------|--|--|-----------------------------|
| 10            | Review of prayer rooms at council premises  | Review the policy / practice around prayer rooms at council premises including the internal guidance and communications to support staff and managers leading into religious festivals and events.   | Oct-10              | Opportunities Manager (Agreed to delegate to HR equality officer at Opportunities Working Group on 4 October 2010 due to being a workforce issue.) |  | NOT IMPLEMENTED - (Delayed) |
| 18            | To encourage participation from DV Support Services in the borough  | Attendance/representation at Domestic Violence Specialist Services Group (DVSSG) meetings. Minimum 4 themed meetings per year and disseminate best practice briefings.   | Ongoing             | Principal Community Safety Officer   | Meetings are underway                              | IMPLEMENTED                 |
| 31            | Provide a framework for a safe, efficient, integrated and environmentally sustainable transport system for people and goods giving high priority to the needs and safety of "vulnerable" travellers | Consult on and produce an updated Local Implementation Plan for transport  | Commence March 2010 | AD Highways and Engineering  | Awaiting publication of updated Strategy<br>Mayors | PARTLY IMPLEMENTED          |
| 40            | Continue to improve accessibility to the borough's Choice-Based Lettings Scheme (Source: Housing Options Division Performance Business Plan 2009-2012)  | Focus on access for those with learning difficulties, mental health problems, older people and various BME communities by organising 10 demonstration sessions for members of these client groups and advocates and support professionals working with them. | 2010/2011           | CSD Housing and Community  |  | PARTLY IMPLEMENTED          |
| 49            | Public consultation on regeneration schemes   | Obtain regular and ongoing feedback that consultation is effective.  | Ongoing             | HO Strategic Regen / AD Regeneration & Housing Strategy  |  | PARTLY IMPLEMENTED          |

| Action Number | Aim  | Target   | Timescale                    | Lead Officer   | Reported Progress in SES June 2010   | Implementation Status         |
|---------------|--|--|------------------------------|--|--|-------------------------------|
| 54            | Ensure females of different faith groups are actively engaging in physical recreation at the borough's leisure facilities        | Introduce female only sessions within the centres and consult on varying the programme on a regular basis. | Ongoing up to March 2011     | Senior Sports Development Manager  | Female only sessions introduced at Phoenix Fitness Centre  | IMPLEMENTED                   |
| 64            | Provide extra orange recycling bags to elderly and disabled people   | Extra orange recycling bags given to disabled and elderly residents on a more regular basis.               | Ongoing                      | Recycling Manager  | Already in place   | PARTLY IMPLEMENTED            |
| 71            | To increase access to services for vulnerable children and young people  | Reduction of unknown ethnicity of patients to 10%  | 2008-11                      | Commissioning Manager, NHSF. / AD Commissioning, Performance & Partnership |  | NOT IMPLEMENTED (No Response) |
| 76            | Empower young people to have a greater voice   | 95% of looked after young people participate in their reviews  | 2009                         | Dep Head of Review, Quality and Assurance / AD Children, Youth & Community | 94.9% of looked after young people participated in their own reviews in 2007-08  | PARTLY IMPLEMENTED            |
| 79            | Improve business satisfaction with regulatory services   | Monitor service satisfaction by the use of surveys   | Ongoing                      | AD Public Protection and Safety  | Survey for designed, initial surveys undertaken  | NOT IMPLEMENTED (No Response) |
| 84            | Establish service directory for Supporting Your Choice (SYC)   | Identify local providers of support services, develop web based directory for brokers and purchasers.      | First draft by December 2009 | AD QCP   | In progress - all providers offered opportunity to be included in service directory. Forms being collated and uploaded | PARTLY IMPLEMENTED            |
| 91            | Understand and respond to inter-generational homelessness (Source: Housing Options Division Performance Business Plan 2009-2012) | Commission research on the causes of inter-generational homelessness and devise prevention strategies      | 2010/2011                    | Head Of Housing Advice & Assessment Unit                                   |  | NOT IMPLEMENTED (Cancelled)   |

| Action Number | Aim  | Target   | Timescale         | Lead Officer  | Reported Progress in SES June 2010  | Implementation Status |
|---------------|--|--|-------------------|---|---|-----------------------|
| 95            | Secure Future Jobs Fund (FJF) and establish trainee jobs for residents (aged 16-25 and claiming job seekers allowance for 9 months plus) | West London scheme funding secured<br>Job roles developed and locations agreed<br>Support mechanisms established including job search help as FJF post is for 6 months only<br>H&F scheme funding secured                        | March 2010 - 2011 | Head of Economic Development  | Funding secured   | IMPLEMENTED           |
| 98            | Establish LBHF work placement scheme to increase unpaid work experience, wellbeing and life chances for residents                        | 100 residents undertaking unpaid work across the council by March 2011; 25 by March 2010<br>Support mechanisms in place for every volunteer including induction; time off to attend job interviews, coaching and job search help | Ongoing           | Head of Economic Regeneration/ AD Housing Strategy and Regeneration | Recruitment for 35 volunteers now underway to work across 6 work settings. Handbook and policy documents in place | PARTLY IMPLEMENTED    |
| 103           | Harassment procedure reviewed and updated  | Harassment procedure updated to reflect new legislation, case law and best practice. Equality impact assessment to be completed.   | Dec-10            | FCS Human Resources   | Procedure drafted, consultation with stakeholders about to commence   | IMPLEMENTED           |

**Statement of Responsibility**

We take responsibility for this report which is prepared on the basis of the limitations set out below.

The matters raised in this report are only those which came to our attention during the course of our internal audit work and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. Recommendations for improvements should be assessed by you for their full impact before they are implemented. The performance of internal audit work is not and should not be taken as a substitute for management's responsibilities for the application of sound management practices. We emphasise that the responsibility for a sound system of internal controls and the prevention and detection of fraud and other irregularities rests with management and work performed by internal audit should not be relied upon to identify all strengths and weaknesses in internal controls, nor relied upon to identify all circumstances of fraud or irregularity. Auditors, in conducting their work, are required to have regards to the possibility of fraud or irregularities. Even sound systems of internal control can only provide reasonable and not absolute assurance and may not be proof against collusive fraud. Internal audit procedures are designed to focus on areas as identified by management as being of greatest risk and significance and as such we rely on management to provide us full access to their accounting records and transactions for the purposes of our audit work and to ensure the authenticity of these documents. Effective and timely implementation of our recommendations by management is important for the maintenance of a reliable internal control system. The assurance level awarded in our internal audit report is not comparable with the International Standard on Assurance Engagements (ISAE 3000) issued by the International Audit and Assurance Standards Board.

**Deloitte & Touche Public Sector Internal Audit Limited**

**London**

**May 2011**

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