



# Internal Audit

## REPORT

### PUBLIC HEALTH 2007-08

**To:** **Diane Burridge** **Director of Operations**

**For information:** Alasdair Bovaird Chief Executive  
Michael Perry Assistant Chief Executive  
Phil O'Dell Director of Resources  
Geoff Smith Head of Environmental Health  
Will Cockerell Principal Environmental Health Officer

#### 1. Introduction

An audit of Public Health has been carried out as part of the 2007-08 audit plan. Detailed tests have been carried out on the systems of control and the management of risk within this area.

#### 2. Findings and recommendations

The detailed findings and recommendations are set out in the attached appendices. A Management Action Plan is attached and we should be grateful if you would arrange for its completion and return by **17 October 2007**. A satisfaction survey has been sent to the Head of Environmental Health.

#### 3. Conclusions

No significant problems were identified during our work. It can therefore be concluded that the systems of control are functioning satisfactorily. The risk of error or misadministration is therefore low

Sheila Bronson  
Acting Audit Manager  
18 September 2007

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### 1.1 AREAS COVERED DURING THE AUDIT

This Internal Audit review of Public Health addressed the following areas within the Environmental Protection Team: -

- The Pest Control Service;
- The Animal Warden Service;
- Light Pollution;
- Noise Pollution;
- Air Pollution and Quality.

The Pest Control and Animal Warden services were last audited in early 2001, but there is no record of Light, Noise or Air pollution having been audited previously.

The key areas of **possible** risk identified at the planning stage of the audit were as follows:

- a) The responses to requests for Animal warden or Pest Control services are inadequate;
- b) Permits are not issued to operators of Authorised Processes when they are applied for, or permits are not renewed;
- c) The monitoring of noise, air and light pollution is inadequate, or complaints regarding them are not handled efficiently;
- d) Management has not identified or considered risks which might prevent services from being provided, or has not implemented suitable controls to mitigate those risks;
- e) The Council fails to carry out its statutory duties in relation to Animal Warden, Pest Control, noise, air and light pollution;
- f) Insufficient qualified and trained staff are available to maintain or support a service, or the arrangements to deal with resignations or requirements are inadequate;
- g) There is an unexpected increase in demand for the services being reviewed;
- h) The aims and objectives of the service are not clearly defined and communicated to all staff, or they do not support the Council's objectives and aspirations;
- i) Customers are not charged for services that can be charged for, or monies received are not properly accounted for;
- j) The operating budget is insufficient or is not monitored;
- k) The Government introduces new legislation for which the Council is not prepared;
- l) Seasonal, climatic, ecological or economic changes occur which result in increased demand;
- m) Partnering organisations fail to cooperate or to provide resources when requested;

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- n) Misleading or incorrect information is provided to businesses or customers regarding services in connection with Animal Warden, Pest Control, Noise, Air and Light pollution;
- o) Information is not provided to customers when it is requested;
- p) Required public registers are not maintained accurately.

The methodology stated in the Terms of Reference document was used to establish and test the controls that management have in place for mitigating or reducing the above risks to an acceptable level.

### 1.2 OVERALL AUDIT OPINION

**Subject to the matters raised below it was confirmed that effective controls are in place to support the administration of this service. We are therefore pleased to report that the likelihood of significant error or maladministration is low.**

### 1.3 PREVIOUS RECOMMENDATIONS

In view of the time interval since the previous Audits it was decided to disregard the recommendations made in the reports.

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#### 1.4 RECORDING COMPLAINTS

A review of the Noise and Air complaints recorded in the Ocella system identified that a large proportion appeared to have been entered by one of the three District Environmental Health Officers (DEHOs), or by the Animal Warden. Until recently complaints were received by the Administration team and we expected to see evidence that this team had entered details of complaints into the system for investigation and / or action by a DEHO or the Animal Warden. This is the case for requests for the Pest Control Officers' services. Enquiries established that Noise and Air, and more recently Light, related complaints and requests for the Animal Warden's services are often poorly defined because Customers' reasons for contacting the Council are varied. Administration staff explained that they consider it is up to the DEHO or the Animal Warden to decide what action is needed, sometimes after telephoning the complainant to elicit more information.

Different methods appear to be used by the Administration team to pass details of complaints to the DEHOs and the Animal Warden, i.e. verbal messages, written notes and email. Because the practitioners are often out of the office there is a risk that messages or necessary details are lost, which could lead to annoying Customers and a consequent impact on the Council's reputation.

Although we appreciate that it is planned to transfer responsibility for taking calls and recording complaints to Customer Services, **we recommend that** the Administrative team be instructed to record details of Noise, Air and Light related complaints and enquiries into Ocella, and to reduce the risk that they are not entered, **we also recommend that** they are recorded into Ocella immediately on receipt.

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### 1.5 RISK MANAGEMENT

Internal Audit has no record of Operational Risk Registers for the areas of Public Health reviewed during this audit. During audit fieldwork the opportunity was taken to determine representative officers' understanding of operational risks and while it is pleasing to report that most were able to identify the significant risks which could prevent them from maintaining service to Customers, it is clear that little consideration has been given to mitigating them.

The Service Plan published on the Intranet (Environment and Culture, 2006/2009) identifies 6 Risks relating to Recycling, the Museum, the Waste transfer station, and delays to the migration of the Dunmow depot. None are identified for the activities within the scope of this Audit. During the planning stage of this Audit we were able to identify a number of possible risks, as listed in paragraph 1.1 above.

**We therefore recommend that** Management consults Environmental Protection team officers and considers these risks to identify appropriate controls, in order to produce suitable Operational Risk Registers addressing the servicing of Noise, Air and Light pollution complaints, and the operation of the Animal Warden and Pest Control Services.

### 1.6 MANAGEMENT INFORMATION

We attempted to use the reporting tools in Ocella to obtain information of use to management, such as trends and the volumes of open and closed complaints for Noise, Air and Light and for the Animal Warden and Pest Control Officers' services. It was apparent that a great many Noise (Nature of Complaint Type 'N') and Air (Nature of Complaint Types 'AP' and 'O') remain open long after they should have – and probably have – been investigated and closed. Examples were seen of Noise or Air complaints remaining open a year or more after their entry into Ocella. There is no 'Nature of Complaint' Type code to record 'Light' complaints.

We have already commented about DEHOs and other specialist officers acting as data entry clerks, in paragraph 1.4. Overall, it is difficult to establish outstanding complaints either by officer identity or by date-range. Although it has been a matter of interest for a year, the absence of a Type for 'Light' makes it impossible to obtain reports of the number of such complaints. Discussions with DEHOs established that 'Light' calls have generally been recorded under 'Nuisance', and that it is their understanding that to add a new Type requires work by the software vendor. Further discussion with the Administrative Officer established that she has the ability and necessary permissions to create a new Type code into Ocella, and can try to do so provided a suitable request is made.

**We therefore recommend that** DEHOs are reminded to ensure that Ocella is updated to record the closure of complaints. **We recommend that** a new Complaint Type is introduced into Ocella to permit 'Light' related complaints and enquiries to be recorded as such to permit documents to be generated. **We also recommend that** reports are scrutinised periodically to identify trends in Noise, Air and Light complaints, and in requests for Animal Warden and Pest Control services.

### 1.7 INFORMATION PRESENTED TO THE PUBLIC

During Audit fieldwork we reviewed the information available on the Council's website. In general we consider it adequate, although other Councils publish more comprehensive details, such as the identity of operators of Authorised Processes, and charges for services. We understand that it is planned that Customer Services take responsibility for disseminating Public Health information to personal and telephone callers in the near future.

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We consider it important that information published on the website is accurate and easily accessible. Interviews and discussions with representative Environmental Protection officers failed to identify any who expect to regularly review the information presented on the web-site currently, or anything made available to enquirers via Customer Services' CRM system.

Our review identified a number of basic punctuation and grammatical errors on the website. It is not immediately obvious how or where in the web-pages advice on different pests might be found, and we identified that links between pages were sometimes incorrectly defined. Although the most significant incorrect link was reported to the Webmaster who immediately corrected the problem, it may be that there are others. The risk is that would-be enquirers may find it necessary to contact the Council to obtain basic information, thereby wasting frontline officers' time.

**We therefore recommend that** officer(s) be identified to assume responsibility for periodically reviewing all information available to the public, at least annually. **We also recommend that** the links be tested to ensure operability and where necessary the Webmaster be asked to correct any invalid links to make it easier for users to access the information

### **1.8 CALLS RECEIVED FROM THE PUBLIC**

As we have already indicated, when a member of the public contacts the Council to either complain about Noise, Air or Light pollution, or to request the Animal Warden's services, it is left to the specialist officer(s) to enter complaints into Ocella. Scripts are being developed to permit the taking of such calls by Customer Services Advisors. We understand that it is hoped to integrate Ocella with the CRM Front Office system so that Ocella will be updated automatically and obviate the need for the specialist officers to enter the calls. There are issues with this approach: the main ones being that no solution has been identified to the difficulty Administrative staff apparently have in properly defining the complaints) has been resolved, and how to alert the appropriate specialist officer that a new complaint or call has been entered into the system, or the action to take if the officer concerned is away from work.

Discussions with practitioner officers established that they have not so far been invited to view or to test the scripts being developed. The intention is for Customer Services Advisors to obtain and record sufficient information to enable the specialist to respond, effectively acting on the officer's behalf. There is a risk that the information collected is inadequate or insufficient.

**We therefore recommend that** arrangements are made for the practitioners (the Animal Warden, the Environmental Health Technician, the District Environmental Health Officers and the Pest Control Officers) to view the CRM scripts to ensure that information collected is complete and sufficient for their needs.

### **1.9 DOCUMENTED PROCEDURES**

We asked officers if they could provide copies of written procedures describing their roles but none were able to do so. There is a risk that if a new or temporary officer has to be engaged they would need training and this would have to be by other officers, adding to their workload. In addition, effective Disaster Recovery / Business Continuity measures include a set of documented procedures for key roles. To reduce the consequences of one or more practitioners leaving the Council's employ, or are otherwise unavailable, and having to be replaced, **we recommend that** procedures are prepared.

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### 1.10 DEPARTMENTAL PLANS

Interviews with officers established that many seem unfamiliar with Service or Departmental Plans. The Head of Division provided a 'Divisional Plan 2007-08' being developed for Environmental Health and we established that it clearly lays out the Corporate Goals & Priorities. He also provided a hard copy of the 'Environment and Culture Service Plan 2006/2009' which also defines aims and objectives. We also identified that the copy of the latter document published on the Intranet appears incomplete. To remove the risk that officers are unable to fully support their services' aims and objectives, **we recommend that** the Plans are communicated to officers by means of Team meetings, etc

### 1.11 STAFFING ARRANGEMENTS

With limited numbers of qualified and trained practitioners, there is a risk that sufficient staff are not available to maintain the service. It was pleasing to establish that arrangements are in place to ensure that at least a basic service can be maintained in the event a practitioner is unavailable for work in the short term, but there is always the possibility that complaints about noise, air and light pollution, or for pest control or animal warden services, increase. Prudence dictates that effective and efficient use is made of the staff resources available. There is evidence (from the Nomad project: Cambridgeshire County Council, the original lead authority for Project Nomad, has now taken on responsibility for this Project from the DCLG. Its purpose is to analyse, demonstrate and evaluate the benefits and savings that can be achieved from introducing mobile and flexible technology solutions) that making officers mobile results in increased effectiveness and efficiency, and in turn this can go some way towards making up any shortfall in capacity. During audit fieldwork we noted that practitioners need to visit the offices to collect paperwork and to access the databases, thereby reducing the time available to respond to complaints and provide the service. If officers can be made more mobile then it will be necessary to provide adequate administrative support to assist them, by way of accepting messages, taking bookings etc. Without wishing to pre-empt any recommendations that might come from a future Organisational Re-engineering review within Environmental Health, **we recommend that** Management keeps itself informed of IT and technological developments so as to be in a position to take advantage of the technology when it becomes available and introduce mobile working.

Practitioners' workloads would be reduced and efficiency improved if they had access to adequate levels of administrative assistance. This assistance was greatly reduced due to the priority given to the implementation of the new waste and recycling strategy and has not been re-established. Such assistance would obviate the need for frontline officers to update Ocella as complaints are dealt with and closed; reports could be generated on their behalf, and there are other tasks such as the review of information presented to the public (as discussed in paragraph 1.7) which could be delegated to an administrative assistant. Officers consulted during this review frequently mentioned the current lack of administrative back-up as a matter of concern. **We recommend therefore that** urgent attention be given to re-establishing an adequate level of dedicated administrative support to both practitioners and management.

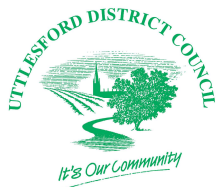
### 1.12 CHARGING FOR SERVICES

Audit fieldwork includes consideration of the cost of operating the service under review. Although legislation requires the Council to provide some services, others are elective, and the Council need only ensure that customers have access to the service. A review of records and reports maintained in Ocella established the high volume of calls on the Pest Control Officers' services. Comments by the Director of Operations prompted an analysis of requests for the service, in particular for the treatment of rats. This established that a high percentage of requests are to arrange this particular service, which is free. A study of the budget books established the Net cost of operating the Pest Control service and it

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may be that this could be reduced by making a nominal charge, of perhaps £10 or £20, for treating rats. We appreciate the difficulties that imposing such a charge might cause, principally possible disputes between residents as to who should pay for service, the potential need to carry out enforcement actions in the event a resident declines to deal with rats, chasing up bad debts, all of which could mean a significant increase to practitioners' workload. A consequence of imposing charges for treating mice was a significant decrease in requests for the service. In 2005 there were 268 requests, but in the first 9 months of 2007 this had reduced to 90. It is possible that introducing a charge for treating rats might have a similar effect. In any event, such a charge cannot be imposed without Members' approval, but in view of the Council's financial position, **we recommend that** consideration be given to proposing such an approach to Members.

Jonathan C. Smith,  
Internal Auditor  
September 2007

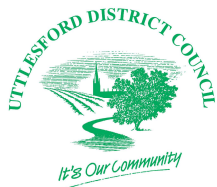


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### MANAGEMENT ACTION PLAN

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Appendix Para	Recommendation	Significance * Low ** Med *** High	Agreed / Not agreed	Officer Responsible	Officer Comments	Implementatio n date
1.4	<p>(a) Although it is planned to transfer responsibility for taking calls and recording complaints to Customer Services, the Administrative team should be instructed to record details of Noise, Air and Light related complaints and enquiries into Ocella, not pass messages to DEHOs</p> <p>(b) To reduce the risk that new complaints are not entered, they should be recorded into Ocella immediately on receipt.</p>	**	Agreed	WGC/AO	<p>Progress to transfer EH services to the CSC is ongoing. Scripts have been prepared for nuisances which will allow the recording of noise, air and light complaints and will go live as soon as IT problems have been resolved.</p>	Nov 2007
		**	Agreed	WGC	<p>We await the appointment (subject to SMB approval) of a dedicated Admin Assistant to EH who will be able to record complaints. JD has been submitted.</p>	April 2008
1.5	Management should consult Environmental Protection team officers to identify and consider operational risks and identify appropriate controls, to be incorporated into Operational Risk Registers addressing the servicing of Noise, Air and Light pollution complaints, and the operation of the Animal Warden and Pest Control Services.	***	Agreed	WGC	Risk registers to be updated to include nuisances and pest control.	April 2008

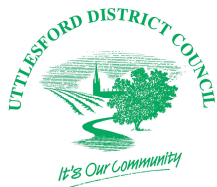




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1.6	(a) DEHOs should be reminded to ensure that Ocella is updated to record the closure of complaints.	***	Agreed	GS & WGC	To be raised at respective team meetings.	Nov 2007
1.6 contd.	(b) A new Complaint Type should be introduced into Ocella to permit 'Light' related complaints and enquiries to be recorded as such and permit the generation of Reports.	***	Agreed	WGC/AO	Anne Owen to be asked to put a new code onto Ocella for light complaints.	Nov 2007
	(c) Trends, such as particular types of complaints, volumes and requests for certain types of pest should identified to assist in planning for their treatment	***	Agreed	WGC	Annual review of pest control complaints is undertaken by WGC.	March 2008
1.7	(a) Information provided to the public in printed form or electronically should be reviewed at least annually, by a designated officer.	**	Agreed	GS	Awaiting the appointment of a dedicated Admin Assistant to EH who will be able to review and update the website.	April 2008
	(b) Links in the website should be tested to ensure operability and, where necessary the Webmaster be asked to correct any invalid links to make it easier for users to access the information	**	Agreed	GS		
1.8	Arrangements should be made for the practitioners (the Animal Warden, the Environmental Health Technician, the District Environmental Health Officers and the Pest Control Officers) to view the CRM scripts being developed to ensure that	***	Agreed	WGC	Scripts have been prepared for Pest Control and agreed with WGC and SK. Other scripts have been drafted and to be agreed with WGC and others before going live.	Nov 2007



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	information collected is complete and sufficient for their needs.					
1.9	Procedures defining the processes involved in handling Noise, Air and Light complaints, and for operating the Animal Warden and Pest Control Services, should be prepared to permit effective Disaster Recovery and Business Continuity. This will also address the consequences of one or more practitioners leaving the Council's employ, or being otherwise unavailable, and replacements trained.	***	Agreed	WGC	Procedures to be developed.	April 2008
1.10	To remove the risk that officers are unable to fully support their services' aims and objectives, the Service and Departmental Plans should be communicated to officers by means of Team meetings, etc.	**	Agreed	GS & WGC	To be discussed at respective team meetings.	Nov 2007
1.11	(a) Management should keep abreast of IT and technological developments so as to be in a position to take advantage of new technology when it becomes available, e.g. to introduce effective mobile working.  (b) The lack of administrative support is a potential or actual concern to management and staff. Urgent attention should be given to re-establishing an adequate level of	**  ***	Agreed  Agreed	GS & WGC  GS	We have been invited to take part in the Council wide project on assessing mobile and home working arrangements.  JD for new dedicated Admin post has been	Nov 2007  April 2008 subject to



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	dedicated administrative support to both practitioners and management.				approved and submitted to SMB for approval.	budgetary restrictions.
1.12	In view of the Council's financial position, we recommend that consideration be given to proposing to Members that charges should be introduced for treating rats.	**	<b>Agreed</b>	GS & WGC	Draft report written for submission to Community Committee in January 2008.	April 2008 subject to committee Approval.

Agreed \_\_\_\_\_ Geoff Smith \_\_\_\_\_ (Head of Division) Date \_\_\_\_\_ 23/10/07 \_\_\_\_\_