

Causeway Coast and Glens Borough Council

Internal Audit Report Street Cleansing

February 2022



INTERNAL AUDIT REPORT

Street Cleansing

Executive Summary

This internal audit was completed in accordance with the approved annual Internal Audit Plan for 2021/22. This report summarises the findings arising from a review of Street Cleansing.

A number of areas have been highlighted in this report where controls could be enhanced. The following table summarises the total number of findings and recommendations from our audit (all recommendations have been accepted by management):

Risk	Number of recommendations & Priority rating		
	1	2	3
It may be that street cleansing work is not planned appropriately and the work is not prioritised correctly leading to streets being unclean or becoming unsafe, and extra costs being incurred.	-	2	1
There may be a lack of risk assessments and inappropriate health and safety within the street cleansing activities which could lead to unsafe practice.	-	2	2
Total recommendations made	-	4	3

Based on our audit testing we are able to provide the following overall level of assurance:

Satisfactory

Overall, there is a satisfactory system of governance, risk management and control. While there may be some residual risk identified this should not significantly impact on the achievement of system objectives.

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Auditor:	Catriona McHugh
Distribution:	Audit Committee Chief Executive Director of Environmental Services Head of Operations Audit Risk and Governance Officer

All matters contained in this report came to our attention while conducting normal internal audit work. Whilst we are able to provide an overall level of assurance based on our audit work, unlike a special investigation, this work will not necessarily reveal every issue that may exist in the Council's internal control system.

1 Objective

The areas for inclusion in the scope of the audit were determined through discussion with management. The scope of this audit is to review the arrangements in place within the Council in relation to street cleansing, focusing on the main risks associated with the following, and considering the impact of Covid-19 on operation and controls:

- Adequate procedures and guidance in place for street cleansing which are in accordance with any regulations.
- Appropriate health & safety measures are in place.
- Appropriate performance monitoring is undertaken.

The audit objectives are to ensure that:

- Street Cleansing work is appropriately planned and managed.
- Appropriate health and safety measures were taken in relation to the Covid-19 pandemic and operate generally around street cleansing.

2 Background

The overall purpose of the street cleansing service is to sustain a Borough that is perceived as clean, safe and well-cared for by its residents, businesses and visitors. Perceptions of cleanliness and safety strongly contribute to residents' sense of well-being, and satisfaction with the neighbourhood in which they live. A clean and well-cared for Borough will also support the economy by influencing business decisions to remain in or re-locate to the area, help sustain and develop the Borough's tourism, and underpin a vibrant cultural life. Council is responsible for sweeping roads, footpaths and removing litter throughout the Borough, helping to keep the environment clean.

The main responsibilities within Council for managing street cleansing fall within the directorate of Environmental Services. The main functions of the Street Cleansing Service is the cleansing of adopted highway areas across the Borough and removal of fly tipping. The service provides a number of statutory tasks including street cleansing, public bin emptying and removal of fly-tipping.

Street Cleansing is undertaken in line with Code of Practice on Litter (DOENI 2012). Planned Street Cleansing is provided on a geographical / regional basis from each of the Council Depots and street cleansing schedules have been developed by Depot.

3 Risks

The risks identified by Internal Audit relating to risk management and agreed with management are as follows:

1. It may be that street cleansing work is not planned appropriately and the work is not prioritised correctly leading to streets being unclean or becoming unsafe, and extra costs being incurred.
2. There may be a lack of risk assessments and inappropriate health and safety within the street cleansing activities which could lead to unsafe practice.

4 Audit Approach

Our audit fieldwork comprised:

- Documenting the systems via discussions with key staff
- Consideration of the key risks within each audit area
- Examining relevant documentation
- Carrying out a preliminary evaluation of the arrangements and controls in operation generally within the Council
- Testing the key arrangements and controls
- Testing the completeness and accuracy of records.

The table below shows the staff consulted with and we would like to thank them for their assistance and co-operation.

Job title
Head of Operations
Area Managers
Supervisors, Coleraine, Limavady, Ballycastle and Ballymoney Depots
Storeman (Coleraine Depot)
Operations Support Officers (Fleet)

5 Findings and Recommendations

This section of the report sets out our findings in relation to control issues identified and recommendations. A summary of all the key controls that we considered is included in Appendix II to this report.

5.1 Risk 1 – Planning and Prioritisation

ISSUE 1 – Documented Work Planning and Prioritisation Processes

a) Observation-

Audit was informed that Street Cleansing is undertaken in line with Code of Practice on Litter (DOENI 2012). Planned street cleansing is based on Zones, which are defined in the Code. The emphasis is on the consistent and appropriate management of an area to keep it clean, not on how often it is cleaned. There are two most common features that will have an impact on the levels and frequency

<p>of attention that needs to be paid to an area to keep level of litter to acceptable standards. These are:</p> <ul style="list-style-type: none"> • the intensity of activity in the area, from people and vehicles; and • health and safety limitations. <p>The Zone assignment may differ during the year depending on the variations in footfall / population and vehicular presence. This would also include for planned events which take place during the year, where it is known that additional street cleansing would be required.</p> <p>Planned Street Cleansing is provided on a geographical / regional basis from each of the Council Depots and street cleansing schedules have been developed by Depot, most of which have been documented.</p> <p>Unplanned street cleansing is undertaken on request, query or based on a complaint.</p> <p>A daily workplan is developed at each Depot for the street cleansing activity to be undertaken that day based on the scheduled activity, amended for any unplanned activity which is required to be completed.</p> <p>There is no internal Council documented policies and procedures outlining the Street Cleansing work planning and prioritisation process.</p>
<p>b) Implication- In the absence of documented procedures there is a risk if there are significant changes in regular staffing or unexpected absences of key staff e.g. due to illness, self-isolation etc. that temporary staff may not plan or prioritise work appropriately leading to streets being unclean or becoming unsafe, and extra costs being incurred.</p>
<p>c) Priority Rating - 3</p>
<p>d) Recommendation- The Operations section should document their work planning and prioritisation processes.</p>
<p>e) Management Response- The planning and prioritising of work is carried out by supervisors and/or managers. Management will document the decision making processes and procedures to mitigate risks associated with unexpected absences.</p>
<p>f) Responsible Officer & Implementation Date- A Mullan April 2022</p>

ISSUE 2 – Update of Street Cleansing Schedules and Optimisation

<p>a) Observation- There have been recent changes to the resources available to Street Cleansing at the Council Depots. The planned Street Cleansing schedules are currently being reviewed and updated to take account of these changes.</p> <p>Based on discussions with Street Cleansing management, street cleansing activity does not totally lend itself to a software application-based optimisation exercise. The planned Street Cleansing schedules being developed will be based on local</p>
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knowledge and experience of the Council areas street cleaning requirements, based on allocated Zones as defined by the Code of Practice on Litter and considering the resources which are available to the Street Cleansing section. Thus the Street Cleansing schedules being developed will be restricted by the resources available and not be service driven, i.e. focused on providing an optimised street cleansing service which will meet legislative requirements.

The availability of Street Cleansing staff for scheduled Street Cleansing activities can be affected by the re-assigning of staff to other Operations activities such as Refuse Collection, due to staff sickness or for other reasons. Street Cleansing staff are re-assigned to other non-Street Cleansing activities as these are seen as greater priority. When this happens scheduled street cleansing activities may be rescheduled to a later time or cancelled until the next scheduled occurrence.

It was explained that due to a lack of available staff resources, litter picking on roads outside of town centres for which the Council is responsible has not been undertaken for several years.

b) Implication-

In the absence of optimal street cleansing plans and schedules, and necessary staff resources there is a risk that street cleansing work is not being effectively and efficiently planned and resourced to meet the Council's legislative requirements, leading to streets being unclean or becoming unsafe.

c) Priority Rating – 2

d) Recommendation-

Street Cleansing should carry out an exercise to determine the realistic optimum required planned street cleansing service provision on a seasonal basis and document the optimised activity schedules and routes, in line with legislative requirements and the Code of Practice on Litter. As part of the planning an estimate for responding to reactive work should be built into the planned activity. To support this they should develop their optimal resource requirements to achieve the planned optimised activity schedules and routes.

Following the optimisation exercise, Street Cleansing should review the optimised activity schedules, routes and resource requirements, against their revised schedules and routes based on the staff resources which they have available and identify the gaps in the service provision and resourcing requirements.

As resources will always be set within budget constraints, Street Cleansing should review the position with the Council and agree the level of Street Cleansing acceptable to the Council and/or agree an action plan to reach an accepted level of service, alongside other supporting activity such as public education campaigns.

The optimised and actual agreed planned activity schedules and routes and action plans should be reviewed regularly (at least annually) to ensure that they remain appropriate.

e) Management Response- Management will review current cleansing service based on legislative requirements, previous service schedules and standards.

f) Responsible Officer & Implementation Date- A Mullan April 2022

ISSUE 3 – Budget, Performance Monitoring and Key Performance Indicators (KPIs)

a) Observation-

The latest Business Plan for 2021/22 includes the budget for Street Cleansing within each Depot budget figure. The budget for Street Cleansing is clearly recorded within the Management Information Accounts Dashboard and presented against actual expenditure which is provided to Street Cleansing management for review.

The Council joined with 9 of the 10 other Northern Ireland Councils to be part of the “Northern Ireland Project”. This is the National Performance Benchmarking Framework that is led and facilitated by APSE Performance Networks.

Street cleansing is monitoring several APSE costs and, productivity related performance indicators. No APSE staff and quality indicators have yet been included but Audit were informed that they are being considered along with the development of additional indicators which the Council consider may be more relevant to measuring their Street Cleansing service provision.

Apart from the above, there is no other formal and systematic process monitoring Street Cleansing activity undertaken or KPIs in place to determine the impact of postponing or re-scheduling planned street cleansing activities.

b) Implication-

In the absence of KPIs to facilitate monitoring and measurement and to obtain feedback on changes to scheduled street cleansing there is a risk that there is insufficient information to determine the impact of changes in scheduled street cleansing activities as a result of resource re-allocation.

c) Priority Rating- 2

d) Recommendation-

The Council should continue to develop and implement a formal and systematic process to monitor street cleansing activity undertaken and review performance against scheduled street cleansing activity, alongside the development of suitable performance indicators.

e) Management Response- Agree with the recommendation including feedback from the litter strategy consultation

f) Responsible Officer & Implementation Date- A Mullan - June 2022

5.2 Risk 2 – Risk Assessment & Health & Safety (H&S)

ISSUE 4 – Health and Safety Policy and Statement

a) Observation-

A copy of the Council's H&S Policy is held at the Depots. The version held is V4 dated 1/4/2015. It is the general Council H&S Policy and specific Depot risk assessments are carried out for each location. Audit was informed that the Council's H&S section are currently in the process of updating the general H&S Policy.

The H&S Policy Statement was displayed at each Depot. However, 2 of the Depots did not initially have the most up to date Statement (August 2021) displayed.

b) Implication-

If staff are not aware of or do not have access to the most up to date health and safety requirements and best practice, specific to their working locations, there is a risk of unsafe practice.

c) Priority Rating- 3

d) Recommendation-

The person with responsibility for a location should ensure that the H&S Policy Statement displayed at the location is the most up to date signed version.

e) Management Response- Agree with recommendation

f) Responsible Officer & Implementation Date- A Mullan - Immediate

ISSUE 5 – Risk Assessments and Training

a) Observation-

Operational activity risks assessments, Risk Assessment Method Statements (RAMS), have been developed. RAMS are periodically reviewed and updated annually. Street Cleansing staff are provided with the relevant RAMS for their roles and must sign off that they have read, understand and will implement them. Staff sign off a summary RAMS listing sheet and not the actual RAMS. When a RAMS has been updated a Toolbox Talk is provided to inform relevant staff of changes to be implemented, details of which are recorded, including staff attendance.

The summary RAMS listing sheet does not contain details of the version number or date of the most recent RAMS.

From a sample of 11 Street Cleansing staff selected for review, 4 of the sampled staff had signed but had not dated the sign off for some RAMS, i.e. 1 staff member had not dated 25 RAMS, 3 staff had not signed off 1 of the RAMS, and 1 had not signed and dated a number of the RAMS which had been identified as relevant to him.

<p>The RAMS and sign off by staff are recorded on “Matrix” (an excel spreadsheet). It was noted that this also does not contain the version of the RAMS which is being signed off. Matrix is also used for recording staff training.</p> <p>Out of 3 depots sampled, 1 did not have a fully populated Matrix for its staff as toolbox talks were not included there.</p>
<p>b) Implication- As the mechanism for recording and monitoring RAMS sign off may not be accurate and up to date, there is a lack of sufficient evidence that staff have signed off the most up to date version of the RAMS. This increases the risk of unsafe practice. Any gaps in evidence also increases the risk of criticism, or being found at fault, by the Health & Safety Executive following any investigation of a H&S incident.</p>
<p>c) Priority Rating- 2</p>
<p>d) Recommendation- The summary RAMS listing sheet which is signed off by staff members to acknowledge that they have read, understand and will implement the RAMS should note the version of the RAMS and the date which it was issued, so that there is no ambiguity as to which version of the RAMS the staff member has read and will be implementing.</p> <p>Street Cleansing management should periodically review the staff sign offs and ensure that all staff have signed off the RAMS applicable to the activities they undertake. This review should be recorded (e.g. signature of reviewer and date review occurred).</p> <p>The Matrix (xls) should contain the version numbers of the RAMS and be updated following the above suggested review for staff sign off, at all Depots.</p> <p>All Depots should use the Matrix (xls) to track and monitor that staff have read and acknowledged implementation of current applicable RAMS and record all staff qualifications and training, including Toolbox Talks, undertaken.</p>
<p>e) Management Response- Agree with recommendations</p>
<p>f) Responsible Officer & Implementation Date- A Mullan – March 2022</p>

ISSUE 6 – Street Cleansing Risk Register

a) Observation-

The operational hazards are identified and mitigated through the risk assessments., however within Street Cleansing there is no risk register to assist recording, monitoring and mitigating other potential risk areas, i.e. governance, managerial, financial and reputational.

<p>Although street cleansing does not hold their own risk register, they advised Audit that they feed their risks into the Operations section of the Environmental Services Risk Register. The risk owner for such risks is the Head of Operations.</p> <p>The Operations section of the ES Risk Register does not specifically refer to Street Cleansing, although it does refer to certain risks that would impact street cleansing e.g. availability of adequate resources, health & safety. Examples of possible risks of street cleansing not reflected on the Operations section of the ES risk register include:</p> <ul style="list-style-type: none"> • The risk of non-compliance with the duties of the Litter (NI) Order 1994 which would result in poor quality of the borough's environment; negative impact on Council's reputation; accusations of dereliction of duty or possible legal action (mitigating actions would include zoning of Council land in line with the Code; appropriate planning of cleaning activities etc.) • The risk that demands for street cleansing activity exceeds available Street Cleansing resources resulting in inability to clean hotspots as frequently as may be needed (mitigating actions could include public education programmes; enforcement activities etc.)
<p>b) Implication- In the absence of specific Street Cleansing risk register. There is a risk that all Street Cleansing risks may not be identified, monitored and mitigated.</p>
<p>c) Priority Rating- 3</p>
<p>d) Recommendation- The Street Cleansing section should consider developing their own risk register against which they can monitor and mitigate all specific Street Cleansing risks; alternatively ensure all specific street cleansing risks are incorporated onto the Operations section of the Environmental Services Risk Register.</p>
<p>e) Management Response- Management will consider individual risk registers for each function of Operations</p>
<p>f) Responsible Officer & Implementation Date- A Mullan - April 2022</p>

ISSUE 7 – Scheduled Street Cleansing Vehicle Inspection / Maintenance

a) Observation-

Street Cleansing vehicles are inspected on a regular 6 / 12 weekly cycle depending on the type of vehicle and resultant servicing requirements identified are carried out. Street Cleansing supervisors are provided with a schedule for the vehicle inspections to allow them to facilitate the inspection.

A sample of 5 Street Cleansing Vehicles were selected and reviewed to ensure that regular inspections were carried out.

<p>For 1 of the vehicles sampled it failed to be presented for a regular inspection and the inspection was not rescheduled. Street Cleansing management explained that at that time there was no fleet manager in place and that the vehicle was not included on the fleet management system at that time.</p>
<p>b) Implication- There is a risk that street cleansing vehicles are not maintained to required standards resulting in potential risk of accidents, failure and damage to vehicles, and/or staff and the public.</p>
<p>c) Priority Rating- 2</p>
<p>d) Recommendation- The Street Cleansing fleet manager should ensure where a vehicle fails to present for an inspection that it is rescheduled immediately.</p> <p>Street Cleansing supervisors should check and inform the fleet manager if an inspection has not been carried out and note that a rescheduled date has been received.</p>
<p>e) Management Response- Fleet Manager now recruited. All vehicle maintenance and checks now recorded on a central database which is accessible by relevant staff and contractors.</p>
<p>f) Responsible Officer & Implementation Date- A Mullan - Implemented</p>

Appendix I: Definition of Assurance Ratings and Hierarchy of Findings

Satisfactory Assurance

Evaluation opinion: Overall there is a satisfactory system of governance, risk management and control. While there may be some residual risk identified this should not significantly impact on the achievement of system objectives.

Limited Assurance

Evaluation opinion: There are significant weaknesses within the governance, risk management and control framework which, if not addressed, could lead to the system objectives not being achieved.

Unacceptable Assurance

Evaluation opinion: The system of governance, risk management and control has failed or there is a real and substantial risk that the system will fail to meet its objectives.

Hierarchy of Findings

This audit report records only the main findings. As a guide to management and to reflect current thinking on risk management we have categorised our recommendations according to the perceived level of risk. The categories are as follows:

Priority 1: Failure to implement the recommendation is likely to result in a major failure of a key organisational objective, significant damage to the reputation of the organisation or the misuse of public funds.

Priority 2: Failure to implement the recommendation could result in the failure of an important organisational objective or could have some impact on a key organisational objective.

Priority 3: Failure to implement the recommendation could lead to an increased risk exposure.

Appendix II: Summary of Key Controls Reviewed

Budgetary Control

Risk	Key Controls
<p>It may be that street cleansing work is not planned appropriately and the work is not prioritised correctly leading to streets being unclean or becoming unsafe, and extra costs being incurred.</p>	<ul style="list-style-type: none"> • An Annual Business Plan, which covers Street Cleansing activities, is in place (this may be a service area BP) • Documented policies and procedures to support work planning and prioritisation are in place. • A task management process or software is used to register, allocate and manage planned street cleaning and ad hoc requests for street cleaning • An exercise in route optimisation has been carried out and is kept under review • Prioritisation of street cleaning is carried out in an appropriate manner • Processes are put in place to manage workloads if they become excessive • Budgets are in place and are monitored throughout so as not to be exceeded. • Staff follow work plans that are in place. • Staff are aware of all their responsibilities regarding street cleaning. • There is an adequate number of staff/resources to complete work in a timely manner • There is a process in place to monitor activity levels and performance • Key performance indicators are in place.
<p>There may be a lack of risk assessments and inappropriate health and safety within the street cleansing activities which could lead to unsafe practice.</p>	<ul style="list-style-type: none"> • Health and Safety policies and procedures are in place and available to staff • Lone working policies and procedures are in place and staff are aware of these • Policies and procedures are reviewed and updated periodically • PPE requirements have been assessed and appropriate PPE provided to staff • PPE requirements were reviewed and updated because of Covid-19 • Risk assessments are undertaken prior to the commencement of cleansing operations considering the following: <ul style="list-style-type: none"> • Task risk assessment are undertaken prior to the commencement of cleansing operations • Route risk assessment are undertaken prior to the commencement of cleansing operations, and cover depot and waste discharge sites

Risk	Key Controls
	<ul style="list-style-type: none">• Risk assessments consider changing conditions such as weather, traffic levels etc.• All staff receive training and information on the findings of completed risk assessments• Risk assessments should be reviewed and updated periodically, in line with an agreed frequency of review• A database or other log of risk assessments is in place (and includes planned review dates)• Risk assessments were reviewed and updated because of Covid-19• Risk assessments are reviewed following any accident or near miss• Staff are given risk assessment training• Staff are given health and safety training• Identified hazards should result in a reasonable and practical control measure to reduce risk to the lowest level• Identified risks are not left uncontrolled.• Any risks threatening street cleaning are identified and scored and included on a relevant Risk Register and• Equipment and asset checks are regularly completed and documented• Staff have the appropriate qualifications to operate relevant equipment

Appendix III: Limitations and responsibilities

Limitations inherent to the internal auditor's work

We have undertaken this review subject to the limitations outlined below:

Internal control

Internal control systems, no matter how well designed and operated, are affected by inherent limitations. These include the possibility of poor judgement in decision-making, human error, control processes being deliberately circumvented by employees and others, management overriding controls and the occurrence of unforeseeable circumstances.

Future Periods

Our assessment of controls is for the period specified only. Historic evaluation of effectiveness is not relevant to future periods due to the risk that:

- The design of controls may become inadequate; or
- The degree of compliance with policies and procedures may deteriorate.

Responsibilities of management and internal auditors

It is management's responsibility to develop and maintain sound systems of risk management, internal control and governance and for the prevention and detection of irregularities and fraud. Internal audit work should not be seen as a substitute for management's responsibilities for the design and operation of these systems.

We endeavour to plan our work so that we have a reasonable expectation of detecting significant control weaknesses and, if detected, we carry out additional work directed towards identification of consequent fraud or other irregularities. However, internal audit procedures alone, even when carried out with due professional care, do not guarantee that fraud will be detected.

Accordingly, our examinations as internal auditors should not be relied upon solely to disclose fraud, defalcations or other irregularities which may exist.