

REDACTED



INTERNAL AUDIT FINAL REPORT

HOUSING, PLANNING AND REGENERATION DEPARTMENT

REVIEW OF HOUSING NEEDS, EARLY INTERVENTION AND ADVICE (OPTIONS AND ASSESSMENT)

Issued to: Assistant Director, Housing
Head of Housing Options and Support
Housing Options Group Manager
Head of Finance ASC Health & Housing (Final only)
Director of Housing, Planning and Regeneration (Final only)

Prepared by: Principal Auditor

Reviewed by: Head of Audit and Assurance

Date of Issue: 20th January 2022

Report No.: PLA/04/2021

REVIEW OF HOUSING NEEDS, EARLY INTERVENTION AND ADVICE (OPTIONS AND ASSESSMENT)

INTRODUCTION

1. This report sets out the results of our audit of Housing Needs, Early Intervention and Advice. The audit was carried out as part of the work specified in the 2021-22 Internal Audit Plan agreed by the Section 151 Officer and Audit Sub-Committee. The controls we expect to see in place are designed to minimise the Council's exposure to a range of risks. Weaknesses in controls that have been highlighted will increase the associated risks and should therefore be addressed by management.
2. The Homelessness Reduction Act 2017 significantly reformed England's homelessness legislation by placing duties on local authorities to intervene at earlier stages to prevent homelessness in their areas. It also requires housing authorities to provide homelessness services to all those affected, not just those who have 'priority need.' These include:
 - a) an enhanced prevention duty extending the period a household is threatened with homelessness from 28 days to 56 days, meaning that housing authorities are required to work with people to prevent homelessness at an earlier stage and,
 - b) a new duty for those who are already homeless so that housing authorities will support households for 56 days to relieve their homelessness by helping them to secure accommodation.
3. The housing authority has a duty to provide advice and information about homelessness, the prevention of homelessness and the rights of homeless people or those at risk of homelessness, as well as the help that is available from the housing authority or others and how to access that help. The service should be designed with vulnerable groups in mind and authorities may provide it themselves or arrange for other agencies to do so on their behalf.
4. Housing authorities must give proper consideration to all applications for housing assistance, and if they have reason to believe that an applicant may be homeless or threatened with homelessness, they must make enquiries to see whether they owe them any duty under Part 7 of the 1996 Act.
5. Housing authorities have a duty to:
 - a) carry out an assessment in all cases where an eligible applicant is homeless or threatened with homelessness; and,
 - b) take reasonable steps to help prevent any eligible person who is threatened with homelessness, from becoming homeless.

REVIEW OF HOUSING NEEDS, EARLY INTERVENTION AND ADVICE (OPTIONS AND ASSESSMENT)

6. In December 2019, the service went live with a new Housing Case Management Software system which contains a workflow system which guides officers to 'compulsorily update', in order to progress a case effectively.
7. Between April and September 2021, 1,704 approaches ('knocks on door') had been received, of which 655 required advice only and 1,049 resulted in a Homeless Application. The Performance Digest reflects that 'I am being evicted/asked to leave where I am staying', accounts for the highest number of approaches at 34% (575).
8. We would like to thank everyone contacted during this review for their help and co-operation.

AUDIT SCOPE

9. The original scope of the audit was outlined in the Terms of Reference issued in October 2021 and the key risks reviewed within this audit were:-
 - Information, advice and guidance is not available to everyone who requires advice and assistance to resolve a housing issue, including being homeless or threatened with homelessness
 - Housing Options Assessment forms are not processed in a fair, consistent, timely and correct manner
 - Performance of the service is not monitored regularly, corrective actions are not taken to address any issues and the information/data is not used effectively to improve the quality and efficiency of the service
 - Changes to service delivery and relaxation of governance arrangements may lead to weaknesses in the controls previously in place

AUDIT OPINION

10. Our overall audit opinion, number and rating of recommendations are as detailed overleaf:

REVIEW OF HOUSING NEEDS, EARLY INTERVENTION AND ADVICE (OPTIONS AND ASSESSMENT)

AUDIT OPINION	
Reasonable Assurance	(Definitions of the audit assurance level and recommendation ratings can be found in Appendix B)

Number of recommendations by risk rating		
Priority 1	Priority 2	Priority 3
0	3	1

SUMMARY OF FINDINGS

The Housing Options 'Front door' was adapted in light of COVID-19 with a greater emphasis on prompt on-line and telephone communication, with support available for applicants accessing the service via both channels. Procedures are documented and management support is available to the Housing Options officers via the Duty Manager system.

We would wish to bring the following four areas to Management's attention:-

Online Information

The current structure and content of the Housing Options and Advice section of the Bromley website www.bromley.gov.uk directs people requiring advice and general assistance with a query or problem regarding housing issues, to contact the Housing Options Team and complete a Housing Advice and Assistance Form. Signposting/Self Help information is negligible and does not effectively support people to make decisions about how to retain control over their housing situation, find solutions within the community and third sector or navigate the process to identify and understand the self help and support options available.

REVIEW OF HOUSING NEEDS, EARLY INTERVENTION AND ADVICE (OPTIONS AND ASSESSMENT)

Quality standards and management oversight of cases

Although examples of comprehensive Personal Housing Plans were seen, there were also gaps in information and inappropriately completed Plans. Additionally, one Personal Housing Plan could not be located. Whilst all 21 cases sampled had been closed on the Housing Case Management Software system, only seven were at management level and, of those, one had been closed by the manager who had completed the Personal Housing Plan. One assessment reflected 76 days between the date of the application and the assessment with no identifiable cause for delay. Although it is noted that the Prevention and Relief Duty stages can exceed the 56 days stated in the Homelessness Reduction Act, over half (8/14), Prevention/Relief cases had remained open for longer than 56 days, with timescales ranging from 63 to 151 days.

ID/Passwords/Security Question and Answer

It was noted that an E mail had been sent to an applicant which contained their household ID, password, security question and answer, together with the link to the Housing Portal. This information could enable unauthorised third party access to the applicant's personal information on the Portal.

Agreement of the Applicant to the Personal Housing Plan

Whilst it is acknowledged that the applicant's verbal agreement to their Personal Housing Plan would be recorded in the relevant box on the Housing Case Management Software system, it would be best practice to routinely seek the applicant's tangible agreement (or lack of) to the Personal Housing Plan to confirm that they have (or have not) accepted the actions to be undertaken by them and the Housing department to support them to remain in, or to secure, suitable accommodation.

DETAILED FINDINGS / MANAGEMENT ACTION PLAN

11. The findings of this report, together with an assessment of the risk associated with any control weaknesses identified, are detailed in Appendix A. Any recommendations to management are raised and prioritised, together with management's responses and timescales for implementation. Appendix B details the definition of the audit assurance and priority ratings.

REVIEW OF HOUSING NEEDS, EARLY INTERVENTION AND ADVICE (OPTIONS AND ASSESSMENT)

DETAILED FINDINGS AND ACTION PLAN

APPENDIX A

1. <u>Online information</u> (www.bromley.gov.uk)	
<u>Finding</u> <p>The current structure and content of the Housing Options and Advice section of the Bromley website www.bromley.gov.uk directs people requiring advice and general assistance with a query or problem regarding housing issues, to contact the Housing Options Team and to complete a Housing Advice and Assistance Form. Signposting/Self Help information is negligible and does not effectively support people to make decisions or find solutions within the community and third sector.</p> <p>An enhanced Housing Options and Advice Front Door Offer on the www.bromley.gov.uk website with Information, Advice and Guidance and details of specialist organisations, could divert some potential applicants, who are able to self manage, away from the Housing Options and Advice service and may also support those who may be reluctant to become formally known to the service.</p>	
<u>Risk</u> <p>The Information, Advice and Guidance offer may not enable people to make the best decisions about how to retain control over their housing situation or navigate the process to identify, and understand, the self help and support options available.</p>	
<u>Recommendation</u> <p>The structure and content of the Information, Advice and Guidance suite of pages and documents on www.bromley.gov.uk should be reviewed and enhanced, both as individual elements and the 'offer' as a whole. Ownership should be defined, together with ongoing responsibilities to ensure the information and advice published enables people to understand the self help and support options available and how these may be accessed.</p>	<u>Rating</u> 
<u>Management Response and Accountable Manager:</u> <p>Head of Housing Options & Support in liaison with Head of Compliance & Strategy</p> <p>This has been identified as a critical piece of work, for the department as a whole and is being led on by Compliance and Strategy. We recognise that as a minimum, housing advice needs to be available, accessible and clear to a wide audience to support them in finding a solution to their housing situation.</p> <p>The Compliance & Strategy Team has already begun work to benchmark against other LA websites to ensure that the updated information is in line with good practice and also reflects the current work and housing options provided by the service on a day to day basis.</p>	<u>Agreed timescale</u> <p>Whilst this will be ongoing the initial review and adjustments will be made by 31st March 2022.</p>

2. Quality Standards Framework and management oversight of cases

Finding

During the course of the audit, issues of Personal Housing Plans containing sections which had either not been completed or had been inappropriately completed were identified in 6/21 cases. In a further case, the Personal Housing Plan could not be located.

14/21 cases had not been closed at management level on the Housing Case Management Software system and a further case had been closed by the same manager who had completed the Personal Housing Plan.

One assessment reflected 76 days between the date of the application and the assessment with no identifiable cause for delay.

By observation of the Case Outcome Prevention Duty data, it was established that 5/7 Prevention Duty cases had remained open for longer than 56 days and had not moved to the Relief Stage. Timescales ranged from 63 to 151 days.

By observation of the Case Outcome Relief Duty data, it was established that 3/7 Relief Duty cases had remained open for longer than 56 days and had not moved to Main Duty. Timescales ranged from 69 to 93.

Fuller details of the anomalies and the Sample Numbers to which they relate can be located in Appendix C on Pages 11 and 12.

Risk

Whilst it is noted that discussions have been had within the department to implement a programme of case file audits, at the time of the Internal Audit, this had yet to commence. Without management oversight of cases and a quality standards framework in place to measure and quality assure areas such as compliance with legislation, adherence to policy and ensure completion of casework to a minimum standard, gaps may not be identified, errors may occur and appropriate action may not be taken to improve quality and the efficiency of the service.

Whilst it is acknowledged that the data from the Housing Case Management Software system, which feeds into the quarterly statutory return to the Department for Levelling Up, Housing and Communities, is subject to a quality assurance process for missing data and obvious anomalies, management oversight of the cases would provide reassurance on areas such as dates input, which are of primary importance for fields which, for example, calculate the number of days a case remains open. Data provided to the Department for Levelling Up, Housing and Communities may be used as a factor in Grant funding calculations, therefore accuracy is paramount.

REVIEW OF HOUSING NEEDS, EARLY INTERVENTION AND ADVICE (OPTIONS AND ASSESSMENT)

DETAILED FINDINGS AND ACTION PLAN

APPENDIX A

3. <u>ID/Passwords/Security Question and Answer</u>	
<u>Finding</u> During the course of the Audit, it was noted that for Sample 1, an E mail had been sent to the applicant which contained the following information:- <ul style="list-style-type: none">• Link to the Housing Portal• Household ID• Password• Security Question• Security Answer	
<u>Risk</u> These details could enable unauthorised third party access to the applicant's personal information on the Portal.	
<u>Recommendation</u> All Housing Options staff should be reminded of their Data Protection and Confidentiality Responsibilities.	<u>Rating</u> 
<u>Management Response and Accountable Manager:</u> Housing Options Group Manager in conjunction with Head of Compliance & Strategy A recent email has been sent to all officers, listing the agreed actions to working with customers who may need assistance with log ins, or renewing passwords. As a result of this audit a further email will be sent, setting out the procedures to ensure that we are GDPR compliant and also discussed with Officers in their 1-2-1 meetings with Team managers.	<u>Agreed timescale</u> 31 st January 2022

REVIEW OF HOUSING NEEDS, EARLY INTERVENTION AND ADVICE (OPTIONS AND ASSESSMENT)

DETAILED FINDINGS AND ACTION PLAN

APPENDIX A

4. <u>Agreement of the Applicant to the Personal Housing Plan</u>	
<p><u>Finding</u></p> <p>The Homelessness Code of Guidance for Local Authorities (12th October 2021 update) states in section 11.29 that:- 'Housing authorities should make every effort to secure the agreement of applicants to their personalised housing plans. Identifying and attempting to address personal wishes and preferences will help achieve that agreement and improve the likelihood that the plan will be successful in preventing or relieving homelessness'.</p> <p>Whilst it is acknowledged that the 'Does the Applicant Agree with the Plan' section on the Housing Case Management Software system would be recorded with 'Yes/No' on receipt of the applicant's verbal confirmation, and that lack of agreement to the Plan would not result in the suspension/withdrawal of support, it would be best practice to routinely seek the applicant's tangible agreement (or lack of) to the Personal Housing Plan.</p> <p><u>Risk</u></p> <p>Without tangible evidence, it cannot be confirmed that the applicant is/is not in agreement with their Personal Housing Plan and has accepted the actions to be undertaken by them and the Housing department to support them to remain in, or to secure, suitable accommodation.</p>	
<p><u>Recommendation</u></p> <p>Personal Housing Plans, available to the applicant via the Portal and sent via E mail as an attachment, contain a 'Does the Applicant and the Council agree on the above Personalised Plan' statement with Applicant and Officer signature boxes for either agreement with, or lack of agreement to, the Plan. Best practice would be to obtain the applicant's tangible acceptance of (or lack of agreement to) the Personal Housing Plan which, if this cannot be achieved electronically via the Portal, could be via E mail.</p>	<p><u>Rating</u></p> <div style="border: 1px solid black; background-color: #90EE90; padding: 5px; display: inline-block;">Priority 3</div>
<p><u>Management Response and Accountable Manager:</u> Housing Options Group Manager</p> <p>An email will be sent to all Officers, advising them of the change to the current process. Officers will be asked to email the PHP to the customer, asking them to confirm their acceptance within a certain time limit, noting that no response will be viewed as acceptance of the plan. If there is no response to contest the PHP, it will be accepted that the Customer will be working towards the goals set out within the document.</p>	<p><u>Agreed timescale</u></p> <p>Meeting with Team being held 24th January 2022. To be implemented 1st February 2022.</p>

Assurance Level

Assurance Level	Definition
Substantial Assurance	There is a sound system of control in place to achieve the service or system objectives. Risks are being managed effectively and any issues identified are minor in nature.
Reasonable Assurance	There is generally a sound system of control in place but there are weaknesses which put some of the service or system objectives at risk. Management attention is required.
Limited Assurance	There are significant control weaknesses which put the service or system objectives at risk. If unresolved these may result in error, abuse, loss or reputational damage and therefore require urgent management attention.
No Assurance	There are major weaknesses in the control environment. The service or system is exposed to the risk of significant error, abuse, loss or reputational damage. Immediate action must be taken by management to resolve the issues identified.

Recommendation ratings

Risk rating	Definition
Priority 1	A high priority finding which indicates a fundamental weakness or failure in control which could lead to service or system objectives not being achieved. The Council is exposed to significant risk and management should address the recommendation urgently.
Priority 2	A medium priority finding which indicates a weakness in control that could lead to service or system objectives not being achieved. Timely management action is required to address the recommendation and mitigate the risk.
Priority 3	A low priority finding which has identified that the efficiency or effectiveness of the control environment could be improved. Management action is suggested to enhance existing controls.

Finding 2 - Quality standards and management oversight of cases – Sample data

During the course of the audit, the following issues were identified amongst the sample of cases which had been accepted for Prevention, Relief or Main Duty assistance.

a) Personal Housing Plan anomalies

In 6/21 Personal Housing Plans reviewed, sections had either not been completed or had been inappropriately completed and in a further case, a Personal Housing Plan could not be located:-

For Sample 8, the 'Circumstances that caused applicant to be threatened with homelessness' section had been annotated with 'Refer to Assessment Notes'.

For Sample 11, none of the following sections had been completed:-

- Housing needs of the applicant
- Housing wishes of the applicant
- Support needs of the applicant to acquire and maintain accommodation.

For Sample 14, in addition to the sections above, the 'Circumstances that caused the applicant to be threatened with homelessness' had not been completed.

For Sample 17, In each of the following sections, the applicant's name had been put in the boxes with no other detail:-

- Circumstances that caused the applicant to be threatened with homelessness
- Housing needs of the applicant
- Housing wishes of the applicant
- Support needs of the applicant to acquire and maintain accommodation.

For Sample 20, the 'Support needs of the applicant to acquire and maintain accommodation' had not been completed.

For Sample 21, the 'Housing wishes of the applicant' had not been completed

For Sample 4, a Personal Housing Plan could not be located.

b) Case closures on the Housing Case Management Software System

14/21 cases (Samples 2 – 14 and 17) had not been closed by a Manager on the Housing Case Management Software system. A further case (Sample 1) had been closed by the same manager who had created the Personal Housing Plan.

c) Timeliness of Assessments

Sample 4 was reflecting 76 days between the date of the application and the assessment with no identifiable cause for the delay.

d) Cases exceeding the 56 day time scales.

By observation of the Case Outcome Prevention Duty data, it was established that 5/7 (Sample 1, 2, 3, 6 and 7) Prevention duty cases had remained open for longer than 56 days and had not moved to the Relief Stage. Timescales ranged from 63 to 151 days. The Performance Digest for September reflected that 'At the end of September 21, 83 Prevention Duties had been opened and not marked with an end date *of which 71% or 59 cases are out of time*'.

By observation of the Case Outcome Relief Duty data, it was established that 3/7 (Samples 8, 11 and 12) Relief duty cases had remained open for longer than 56 days and had not moved to Main Duty. Timescales ranged from 69 to 93 days. The Performance Digest for September reflected that 'At the end of September 21, 209 Relief Duties had been opened but not marked with an end date *of which 75% or 157 cases are out of time*'.