

REDACTED



FINAL INTERNAL AUDIT REPORT

HOMES FOR UKRAINE

PLA/04/2023

15 December 2023

Auditor	Principal Auditor
Reviewer	Head of Audit and Assurance

Distribution list

Director of Housing, Planning, Property and Regeneration
Head of Compliance & Strategy / Asylum Lead
Homes for Ukraine Operational Manager
Homes for Ukraine Project Co-Ordinator
Assistant Director, Exchequer Services

Executive Summary

Audit Objective	The objective of this audit was to review the effectiveness of the controls over the Council's approach to the Homes for Ukraine scheme and the mitigation of associated risks.
------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Assurance Level		Findings by Priority Rating		
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.	Priority 1	Priority 2	Priority 3
		0	4	0

Key Findings
<p>We identified areas of good practice and sound controls as set out below:</p> <ol style="list-style-type: none"> 1. The Homes For Ukraine (HFU) scheme is included on the Corporate Risk Register, with existing controls to mitigate the risk and further action required. Updates on the Homes for Ukraine scheme are provided to the Executive each quarter and the Chief Executive each month. 2. The HFU team have set up a 'Ukraine Support Hub' which operates from the Civic Centre every Thursday. It enables Ukrainians and residents hosting them to visit and receive advice and support, from Bromley Council representatives and other agencies, on a range of matters including housing, employment and school placements. We visited the Hub during our audit and evidenced the significant contribution which it makes. 3. For each of the cases in our sample, the welcome visit had taken place following the guest's arrival at the host property. The questions asked on the welcome form followed the suggested HFU welfare checks guidance on the gov.uk website. The result of the visit was documented and recorded correctly on the Housing system. For each of our cases sampled no concerns had been raised. In each case all members of the sponsor household over the age of 16 had been identified and the required level of DBS check had been carried out. 4. For each of the cases in our sample, the home assessment check had been carried out before the guest had moved into the property. 5. There is separation of responsibilities between the HFU team and the Exchequer contractor for the payment process and a signed agreement with the Exchequer contractor setting out respective roles and responsibilities. There is an appropriate level of authorisation for the monthly payment batch. For each case in our sample of 10 we confirmed that the payment to the sponsor and level of payment (£350 or £500 - if the guest had arrived in the UK over 12 months previously) in July 2023 was correct. A self-declaration form had been completed by all of the sponsors in our sample, prior to payment. 6. Considerable assistance is provided by the HFU team to help re-match or re-house a guest who has to vacate a property. Numerous options are explored and assessed. Advice and help is given to try to ensure that the best outcome for the guest is achieved.

We have identified the following areas for management attention:

7. **Length of time between the home assessment and guest moving into the property and the timescale for a welcome visit** (Priority 2). In 6 cases out of the 10 in our sample the guest had moved into the accommodation over 100 days after the home assessment had been carried out. There is no guidance as to whether or not a further home assessment should have been carried out, given the length of time in days since the original assessment and any changes or developments which may have occurred. There is no timescale for carrying out a welcome visit after a guest has moved into a property. Four visits out of our sample of 10 had been made over nine working days after the team had become aware that the guest had moved into the property. **See Recommendation 1.**
8. **Home assessment form – scope and completeness** (Priority 2) – In each case a home assessment had been undertaken prior to the guest moving in. Analysing the answers on the home assessment check form, some of them were unclear on specific matters such as gas and electricity safety and home insurance. Other questions had not been answered. **See Recommendation 2.**
9. **Follow up welfare and safeguarding visits** (Priority 2). In two cases we were informed by the HFU team that a follow up visit was pending, with arrangements being made to arrange a mutually convenient time for the follow up visit. From a quick examination of answers on all the completed forms, not only those in our sample, we could see that there were questions on the form which had not been answered. We noted that in one case the guest was not present and so only the sponsor's view and details of the apparent disagreement were obtained by the visiting officer. **See Recommendation 3.**
10. **Incomplete information obtained from home assessment and welcome visits** (Priority 2). We noted that on the home assessment and welcome visit forms completed for our sample, no answers had been provided to some of the questions. **See Recommendation 4.**

Management has agreed actions for all findings raised in this report. **Please see Appendix A.**

*Definitions of our assurance opinions and priority ratings are in **Appendix B.***

*The scope of our audit is set out in **Appendix C.***

Appendix A - Management Action Plan

1. Length of time between the home assessment and guest moving into the property, and the timescale for a welcome visit.

Finding

In each case in our sample a home assessment had been undertaken prior to the guest moving in. In 6 cases out of the 10 in our sample the guest had moved into the accommodation over 100 days after the home assessment had been carried out. The longest gap was 197 days after the assessment. There is no guidance as to whether or not a further home assessment should have been carried out, given the length of time in days since the original assessment and any changes or developments which may have occurred.

We recognise that it is not easy due to the matching process to know the exact date in the future when a guest will move in, but a tolerance level should be established, after which time a re-assessment of the property takes place.

There is no timescale for carrying out a welcome visit after a guest has moved into a property. The welcome visit is important because it includes a welfare/safeguarding check and may be the first face to face meeting with a member of the Homes for Ukraine team. Four visits out of our sample of 10 had been made over nine working days after the guest had moved into the property. The number of days in these cases were 10, 18, 20 and 24 working days.

Risk

Structural or internal changes to the property, or deterioration to it, may have taken place since the original home assessment, leading to an increased risk of injury for a guest, or the property being deemed unsuitable as living accommodation. If the welcome visit is delayed, guests may not receive essential information and any issues may not be promptly identified and addressed.

Recommendation

Establish a tolerance level and procedure for carrying out a re-assessment of a property prior to a guest moving in, if the original home assessment took place over a given number of days previously.

Set a timescale for a welcome visit to be made after becoming aware that a guest has moved into a property and put in place arrangements to meet this.

Rating

Priority 2

Management Response and Accountable Manager

This is an area for improvement that we had already identified. We have already implemented a new procedure to mitigate against this:

When a new Accommodation Request is received, we review what information we hold to see if we have previously completed a Home Assessment to the accommodation. If we completed a Home Assessment more than 6 months ago, a new Home Assessment will be arranged. If a Home Assessment was completed within the previous 6 months, we review what information we collected at the visit - if the guests arrived, if they have subsequently moved out - and if, based on the information recorded, the accommodation is suitable for the new group. If it doesn't look to be suitable, a new Home Assessment will be completed. If the property looks to be suitable, the Response Officer will review the suitability of the accommodation at the Welcome Visit.

When there is a new arrival, the sponsor is sent an e-mail with the link to the Welcome Visit booking system. If they have not booked within 5 days, they will be contacted by phone. If we are unable to make contact or they still do not book a visit within 5 days, the guest is e-mailed in Ukrainian to ask if they have arrived, if they are staying at the accommodation and making them aware of how to contact our team and details of the Hub. If they respond that they are living in the sponsor accommodation, we ask them to prompt their sponsor to book a Welcome Visit. If this line of communication is still unsuccessful within 5 days, the Response Officer will e-mail a date and time that they will visit the accommodation and two members of staff will then attempt to visit at that time.

We have put these procedures in place but unfortunately it is still dependent on the sponsor engaging with us, which sometimes they do not.

Accountable manager: Homes for Ukraine Project Co-Ordinator

Agreed timescale

29 February 2024

2. Home assessment form – scope and completeness

Finding

We compared, for completeness and any apparent gaps in coverage, the content of the home assessment form used by the Council against the form used by four other Councils, examples of which were provided on the gov.uk website. We noted that:

Other Councils are more specific on safety issues. For example, Bromley's form says 'Is there a carbon monoxide alarm?' whereas another Council's form asks for the date tested and has a 'Safe / Unsafe' option box to be completed.

That Council's form also has questions about medicines being locked away, fuel servicing appliances serviced within the past year and the date tested, and chemicals and alcohol being safely stored. Another Council's form also includes a question about if there are firearms in the home and if they are secured, with an appropriate licence held.

Bromley's form has a question 'Do all rooms have windows that can be opened/closed?' whereas other Councils' forms ask about restrictors on all windows above ground level. Other risks not covered in Bromley's form, but addressed by questions in other Councils' forms include blind cords, safety gates at the bottom of stairs (where appropriate), specific kitchen and bathroom risks and outside risks such as hazardous garden chemicals, garden equipment and garden play equipment. Other Councils' home assessment forms are more comprehensive, both in areas of risk covered and information and evidence obtained to help assess and mitigate those risks. It is not clear on Bromley's form what the criteria and expectations are regarding gas safety and other checks. On one form we saw that there were no smoke alarms at the time of the visit, but the owner said he has them and would install them. There was however no evidence of this being followed up to ensure they had been fitted.

Risk

Guests may be housed in accommodation which is unsafe, leading to injury or loss of life. Relevant areas of risk may not be covered and addressed. Sufficient evidence to mitigate risks may not be obtained so that the Council has a defensible position in the event of an incident.

Recommendation

A review of Bromley's home assessment form in comparison with other Council's forms should be carried out by the HFU team. The review should focus on the scope of questions asked and evidence required and any training which may be required for those completing home assessments in future.

Rating

Priority 2

<p><u>Management Response and Accountable Manager</u></p> <p>The Home Assessment form will be reviewed in line with the examples on the gov.uk website. This has been assigned to the Project Co-ordinator & Response Officer to action. We have already implemented a mechanism for following up on any issues to be addressed which come out of the Home Assessment.</p> <p>Accountable manager: Homes for Ukraine Project Co-Ordinator</p>	<p><u>Agreed timescale</u></p> <p>29 February 2024</p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------

3. Follow up welfare and safeguarding visits.

Finding

We took a sample of 10 cases out of 42 where the guest had moved in between 1 Oct 2022 and 31 March 2023. In two cases we could see that the follow up visit had taken place and an update position on the host and guest(s) had been recorded, including any issues which they were concerned about. In two cases we were informed by the HFU team that a follow up visit was pending, with arrangements being made to arrange a mutually convenient time for the follow up visit.

In five cases analysis showed that the sponsorship ended before a follow up visit could take place. In one case the sponsorship had not been approved originally as the accommodation was not considered suitable, due to overcrowding.

From a quick examination of answers on all the completed forms, not only those in our sample, we could see that there were some questions on the form which had not been answered e.g. 'Have there been any issues that the sponsor/s and guest/s have had to resolve between them and how are they finding ways to communicate any issues that arise?' and 'What is the plan for the future of the placement?'

Regarding the above, there was one case where we could see that those questions had not been answered but later in the form under 'Is there any advice they would give to future sponsors and guests about sharing accommodation?' the written answer was 'The guest was not present. The host does not wish to extend beyond 6 months - serious differences of opinion.' It then sets out what those differences of opinion were. The visiting officer's observations were 'Host advised to give guest notice to leave in 2 weeks' time as this is not working out. Safeguarding team will be notified. Housing options team will be notified.' We noted that in this case the guest was not present and so only the sponsor's view and details of the disagreement were obtained by the visiting officer.

On the gov.uk website, for the initial welfare check visit, under 'During the visit, it says that Councils 'should also ensure all guests and sponsor household listed on the application are correct and present.'

Further down on the website, under 'Follow-up visits' it says:-

'The scheme expects a single visit at the outset, and it is good practice for councils to check how the sponsor-guest relationship is going, and whether support is needed or if any concerns have emerged.

We recommend councils conduct at least one in-person check at the 6-month mark, primarily from a fraud perspective, to check the guest is still living in the accommodation, though this is not mandatory and is up to their discretion.

Councils must choose when and how often any follow-up visits should be made, based on their assessment of need and appropriateness, in line with existing statutory responsibilities for children and adults.'

Risk

Welfare concerns and any support required may not be identified if follow up visits do not take place. There is an increased risk of payment fraud or error.

Recommendation

Review the existing follow up arrangements to ensure that follow up visits for sponsors and guests take place periodically and that the form includes:

- (i) a question for visiting officers to answer, confirming that the guest was seen and is still living in the accommodation, and
- (ii) a question asking if anything has changed since the original assessment and if the accommodation continues to be suitable.

Rating

Priority 2

Management Response and Accountable Manager

We are aware that we are behind with follow up visits which has been due to the increased work in chasing for home assessments and welcome visits. The team are currently working through the list of those who are due a follow up visit and contacting them to book them in.

Accountable manager: Homes for Ukraine Project Co-Ordinator

Agreed timescale

29 February 2024

4. Completeness and quality of information obtained from home assessment and welcome visits.

Finding

We noted that, analysing the answers to the questions on the home assessment and welcome visit forms completed for our sample, no answers had been provided to some of the questions.

For example, on the home assessment form, for the question e.g. 'How many bedrooms are available for the guests?' it had not been answered for any of the 10 cases in our sample. On that form the question has a red asterisk implying that it has to be answered before proceeding to the remaining questions. Another question was 'Is there an unaccompanied minor in the household?' and that had not been answered for three cases in our sample.

On the welcome visit form, for three of the questions e.g. 'Have there been any changes to the household composition since the Home Assessment?' no answers were apparent. That question also has a red asterisk implying that it has to be answered before proceeding to the remaining questions. In one instance the question 'Have you provided the Lead Guest with their payment card?' was answered 'No' but no explanation was then provided as to why.

We noted that some of the answers recorded on the forms were subjective and were in effect the opinion of the person carrying out the visit, with comments on the accommodation and what had been seen, rather than keeping the responses factual and objective.

We noted that the home assessment form, welcome visit form and follow up visit form do not have a link to the Council's privacy notice for the Homes for Ukraine scheme. These forms are however completed by the visiting officer and there is no confirmation that the sponsor has been made aware of the privacy notice and processing of their personal data. The self-declaration form completed by sponsors includes the statement 'I understand and agree that you may use my data to undertake further checks for the prevention and detection of fraud, prior to payment being made to me.'

Risk

The Council may not have obtained complete and relevant information. This may lead to issues not being identified before placing a guest with a sponsor. Sponsors may be unaware how their personal data collected may be used by the Council.

Recommendation

In future, remind visiting officers to be mindful when recording information to ensure that it is always factual and objective, and review each completed home assessment and welcome visit form to ensure that all necessary information has been obtained.

Ensure that sponsors are made aware of the Council's Homes for Ukraine privacy notice and the reasons for processing their personal data.

Rating

Priority 2

<p><u>Management Response and Accountable Manager</u></p> <p>The mandatory questions which do not have an answer have been added since the time those visits took place, or the branching in the form does not lead the respondent to that question as it isn't relevant.</p> <p>We had already added the question "Why have you not provided a payment card?" to the Welcome Visit form.</p> <p>Many officers from across the Council conducted visits prior to having a team in place due to the emergency response required. As such, there are variations in the way the forms have been completed.</p> <p>Visiting officers in the current team will receive further training to ensure there is consistency across the team and that responses are factual.</p> <p>We will add information related to the privacy policy to the forms, including a question confirming the sponsor and (where relevant) the guest/s consent to their information being collected and processed.</p> <p>Accountable manager: Homes for Ukraine Project Co-Ordinator</p>	<p><u>Agreed timescale</u></p> <p>29 February 2024</p>

Appendix B - Assurance and Priority Ratings

Assurance Levels

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.

Action Priority 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.

Appendix C – Audit Scope

Audit Scope

We reviewed the adequacy and effectiveness of controls over the following risks:

- Failure to fulfil statutory obligations, including the risk of legal challenge as a result of providing unsuitable accommodation,
- Risk of incorrect payments to sponsors,
- Failure to identify and address welfare and safeguarding concerns,
- Risk of homelessness due to the ending of sponsor accommodation, with no alternatives readily available, other than temporary accommodation or foster care.

Our scope included the following:

- Checks on accommodation, welfare and safeguarding, including DBS checks.
- Setting up and monitoring payments to sponsors for accommodation provided.
- Recording of sponsor and guest data to the Council's housing case management system.
- The Council's arrangements for re-matching guests if a sponsor's accommodation ends.

Scope exclusion:

We did not compare the recording of sponsor and guest data to the Council's housing case management system to records held on the case management system put in place by the Department for Levelling Up, Housing and Communities (DLUHC).

This was partly due to time constraints but also because we focussed as a priority on the accuracy, completeness and timeliness of the data collected from sponsors and guests and recorded on the Council's housing case management system.