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AYLESBURY VALE DISTRICT COUNCIL

Democratic Services

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17 March 2020

AUDIT COMMITTEE

A meeting of the **Audit Committee** will be held at **6.30 pm** on **Monday 23 March 2020** in **The Paralympic Room, Aylesbury Vale District Council, The Gateway, Gatehouse Road, Aylesbury, HP19 8FF**, when your attendance is requested.

Contact Officer for meeting arrangements: Craig Saunders; csaunders@aylesburyvaledc.gov.uk;

Membership: Councillors: R Newcombe (Chairman), A Waite (Vice-Chairman), C Adams, M Collins, N Glover, A Harrison, S Raven, R Stuchbury, D Town and H Mordue (ex-Officio)

SUPPLEMENTARY AGENDA

6. INTERNAL AUDIT PROGRESS REPORT (Pages 3 - 24)

To consider the attached Internal Audit Report on Housing - Homelessness.

Contact Officer: Kate Mulhearn (01296) 585724



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Internal Audit Report 2019/20

Housing - Homelessness

March 2020

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Distribution List

For action	Lindsey Vallis – Group Manager Regulatory Services Sonia Crawford – Operations Manager (Housing) Julie Oliver – Housing Team Manager
For information	Cllr Mark Winn - Cabinet member for Communities Andrew Small - Director & s151 Officer Jeff Membery - Assistant Director, Customer Fulfilment Audit Committee

This report has been prepared only for Aylesbury Vale District Council in accordance with the agreed terms of reference. The findings should not be relied upon by any other organisation.

1. Executive summary

Report classification*	Total number of findings				
	Critical	High	Medium	Low	
High Risk (27 points)	Control design	-	-	1	-
	Operating effectiveness	-	1	4	2
	Total	-	1	5	2

*We only report by exception, which means that we only raise a finding / recommendation when we identify a potential weakness in the design or operating effectiveness of control that could put the objectives of the service at risk. The definition of finding ratings is set out in Appendix 2.

Summary of findings

This report is classified as high risk and we identified one high risk, five medium risk and two low risk recommendations.

The Housing team is responsible for administering applications for homelessness and deciding whether a duty is owed and if so, whether this is a relief or prevention duty. The Housing Team works with the Debt Advice Team to attempt to prevent homelessness through better management of finances. The Housing Team relies on two Housing Support Officers that are managed under the Contact Centre Team to triage cases and allocate to priority or non-priority or pass through to the Duty Officer as appropriate.

During our audit we found the Housing Team made appropriate decisions based on documentation received and generally operated in accordance with the Homelessness Code of Guidance. Areas of good practice are summarised below. There are however a number of areas where improvement to local internal controls and operation of procedures is required to strengthen the management of this inherently high risk service.

The high risk finding relates to exceptions noted in the completion and communication of 'Personal Housing Plans' (PHPs). Where a person is homeless or threatened with homelessness and eligible, a local authority should draw up a PHP based on its assessment of the applicants need. The plan should contain the steps to be taken to prevent or relieve the applicant's homelessness, it should be communicated and agreed with the applicant and updated as the case progresses.

The findings of this review should be considered in the context of a team with considerable workload pressure, and one that has been reliant on temporary staff with hard to fill vacancies. It is apparent that there is a history of negative team culture surrounding collaborative working and grievances were aired publicly. This appears to revolve around a perception of inequality between team members, particularly around the treatment of temporary and permanent staff members whereby, permanent staff believe they are disadvantaged compared to temporary staff in relation to caseloads. Anecdotally team members expressed concerns around possible culpability if staff members get too deeply involved in a colleague's case and subsequently a problem arises, manifesting in an unwillingness to share and work together.

Management structures have been reviewed in an attempt to increase support to the team and workloads are regularly reviewed, but there is more to be done to address some of these issues at both an individual and team level. Whilst the findings highlighted in this report are not directly a result of 'team issues', the ability to successfully implement actions and embed new processes will be dependent on an effective and respected Management and a cooperative and engaged team to deliver the work.

Our findings are summarised as follows:

- *Personal Housing Plans are not completed as required* - Our testing identified two instances where there was no evidence that Personal Housing Plans had been completed and one further case where it had been completed but there was no evidence it had been sent to the applicant. Completion of a PHP and sharing it with the applicant is a requirement of the Homelessness Reduction Act. There is a need for clarity around procedures and timeframes for completing a PHP where the case is referred for Housing Debt Advice (Finding 1 – High).
- *Internal procedures are not consistently documented, communicated and formally reviewed* - The Code of Guidance provides the practical guidance on how to apply the legislation. It does not however cover detailed operating processes and internal procedures specific to local systems and ways of working. Various supplementary process documents and templates exist but these are not consistently reviewed or maintained in one easily accessible area. There is a need to review the various supplementary process guidance notes, ensure they are up to date, complete and understood. Procedure documentation should include internal performance standards (Finding 2 – Medium).
- *Lack of service performance standards against which to monitor performance and delays in progressing cases* - The team works towards the statutory timeframes set down within the code of guidance, and these in turn drive the workflow processes in Locata. There are however, no internal standards of service against which performance can be monitored. We noted delays in progressing cases at both triage and case review stages in our sample testing. Whilst these cases were delivered within the statutory timeframe, established service standards would have ensured the provision of a more timely service. (Finding 3 – Medium).
- *The duty rota is not up to date or consistently communicated* - There is a need to clarify the role of the Duty Officers, develop a standard mechanism to allocate them, update for changes, and ensure this is clearly communicated. The tracker should be consistently used for all cases, not just pathways, to ensure visibility of all applications (Finding 4 – Medium).
- *Documentation relating to temporary accommodation offers is insufficient* - Notes on files for three cases were not sufficiently detailed regarding the conversations held between officers and applicants about the temporary accommodation process or where they were ultimately placed (Finding 5 – Medium).
- *Review the adequacy of safeguarding training for Housing Support Officers* - The Housing Support Officers had completed mandatory safeguarding elearning but it is recommended that the role be reviewed to determine if it requires any additional safeguarding training over and above this. (Finding 6 – Medium)
- *Case load monitoring and quality reviews could be more structured and risk based* - Caseload monitoring is currently completed on an informal basis and quality reviews should be performed using a risk based approach (Finding 7 – Low).
- *Not all documentation is stored on Locata* - Our testing identified a few instances where case notes were not fully completed, or emails were not attached to the case file (Finding 8 – Low).

Good Practice Noted

A number of areas of good practice were noted during our review as set out below:

- The Council has a strategy in place which incorporates the Homelessness Reduction Act and the Code of Guidance.
- Our interviews with staff confirmed that the Code of Guidance is the defining document to which officers have regard when making decisions relating to homelessness.
- Staff confirmed the procedures for allocating priority and non-priority cases. This is detailed within the documentation used by the Housing Support Officers whilst triaging cases (see Finding 2 re the need Manager approval of these procedures).
- The tracker used by the team to record Pathways cases, is updated when a case is allocated to an officer (see Finding 4 re the use of the tracker for Duty cases).
- Staff were clear about expectations of roles and responsibilities between the Housing Support Officers, Pathway Officers and Housing Advisors.
- Our sample testing found that decisions were made in accordance with the requirements of the Homelessness Reduction Act. Priority and non-priority cases are accurately assessed, clearly documented and accepted.
- Our sample testing confirmed that appropriate information is obtained to reach a judgement about the application. Duty for relief or prevention duty is assessed, clearly documented and accepted.
- Our sample testing confirmed that applicants are advised that any decisions are subject to a review within 21 days of receipt of the decision letter.
- Locata, the system used by officers, has a detailed dashboard overview which allows officers to manage their caseload and identifies cases where there is an overdue action to take either by the applicant or the officer.
- Staff taking telephone calls understand the homelessness duties and that receiving a call can be an application for homelessness. Our sample testing confirmed that there is a clarity between those being at risk of homelessness and those who should be offered advice only.
- During our interviews with staff, they explained that they were aware of safeguarding risks and that concerns would be highlighted and communicated to the required service and documentation attached to the case on Locata (see Finding 6 re. training needs assessment).

Management Comment:

The Housing service has had to respond to significant changes in legislation, working practices and processes following changes introduced by the Homelessness Reduction Act. This audit provides some assurance around working practices and recognises existing good practice as well as identifying areas for improvement. The management team welcome this feedback and will work together to ensure that audit recommendations are effectively implemented within the service.

2. Background and Scope

Background

Homelessness prevention and relief is a statutory function, which falls within the remit of District and Unitary Local Authorities. AVDC's current Homelessness Strategy (approved December 2018) was developed in line with the Homelessness Reduction Act 2017 (HRA) and covers the period 2019-2022. The HRA significantly reformed Homeless legislation, placing duties on local authorities to intervene at earlier stages to prevent homelessness. When the new Act was introduced a revised Homelessness Code of Guidance was issued by MHCLG and this working document is written for practitioners to use on a daily basis in order to correctly apply the legislation.

The HRA expanded the legal duties of councils to prevent homelessness for any eligible applicant at risk of homelessness within 56 days, and to relieve homelessness by helping the applicant secure suitable accommodation which may include provision of temporary accommodation for certain groups of people where the Council know or have reason to believe they are *priority need*.

This effectively means the Council must provide meaningful help to everyone who is homeless or at risk of homelessness, irrespective of their priority need status, as long as they are eligible for assistance by way of their citizenship or immigration status. One of the aims of the Act is to ensure people get help earlier to prevent homelessness wherever possible and this should result in fewer people who are without accommodation and/or requiring temporary accommodation by the local housing authority.

The new duties required AVDC to review its services, processes, systems and technology and a significant increase in the number of homelessness approaches was anticipated, particularly single homeless clients.

The audit will provide assurance over the design and effectiveness of controls currently in place around the application process, case management, including whether the authority is acting in accordance with the Act in terms of acceptance of and closure of cases, and the escalation of potential safeguarding cases.

Scope

The scope covered the key risks set out in the Terms of Reference (see Appendix 2). Our testing included:

- A sample of 20 cases was selected including priority cases and non-priority cases.
- Further testing of 10 debt advice cases was completed to identify whether PHPs are completed within two weeks following the change in procedure in December 2019.
- A sample of 10 duty rota days was selected to identify whether the duty rota was accurate.

This does not represent a comprehensive list of tests conducted.

3. Detailed findings and action plan

1. Personal Housing Plans are not completed as required – Operating effectiveness

Finding

Where a person is homeless or threatened with homelessness and eligible, a local authority should draw up a 'personalised housing plan' (PHP) based on its assessment of the applicants need. The plan should contain the steps to be taken to prevent or relieve the applicant's homelessness. The council should communicate the PHP and asks the applicant to agree to any steps included in the plan.

We selected a sample of 10 cases where a duty was owed to identify whether a PHP had been completed. We found that a completed PHP could not be located for four cases:

- Case 5 September 2019 - there was no evidence on the file that a PHP had been completed or communicated to the client. This case has now been closed without a PHP being completed, meaning the Council has not met the requirements of the Homelessness Reduction Act. The applicant was ultimately housed in temporary accommodation until further housing could be arranged.
- Cases 7 June, 19 September and 12 September 2019 – these had been referred to the Housing Debt Advice team to seek advice to prevent homelessness. Prior to December 2019, the internal process was that this advice would take place first and then the case closed once an agreement had been reached regarding the outstanding debt, without requiring a PHP to be completed. It was then established that this advice was taking too long to be received and that there was not sufficient time for further, preventative action to be taken to ensure the applicant was not made homeless.

The Team Manager confirmed that, as of December 2019, a new process was set up that gives two weeks for debt advice to be received, with an interim PHP being completed during this period. We were advised by the Team Manager in January 2020 that this process has evolved again so that a PHP is completed based on the information available at the time of the application i.e. not waiting two weeks. The PHP is a live document, and following the outcome of any debt advice, should be updated to identify any further action required by either the applicant or the local authority.


Further testing of 10 cases opened since the change in process in December 2019 was completed to confirm that PHPs are being completed following receipt of an application, in any event within two weeks if debt advice is not forthcoming. We found that for eight cases a PHP was completed in accordance with this timeframe and evidenced as being sent to the applicant. Two exceptions were identified as follows:

- Case 30 December 2019 - PHP was marked as being completed but there was no documentation attached evidencing this. It could not be confirmed that a PHP had been completed and communicated to the client.
- Case 13 January 2020 - PHP was marked as being completed and was attached to Locata but there was no documentation confirming it had been sent to the applicant.

There is a lack of clarity over internal processes for the requirements to complete a PHP where housing debt advice is required. This is evidenced by inconsistent completion and communication of PHPs.

Risks / Implications

Where PHPs are not completed, the Council is not adhering to statutory requirements.

<i>Finding rating</i>	<i>Action Plan</i>	
<p>High</p> 	<p>Clarify and document the internal procedures around PHPs for debt advices cases. Investigate whether a report can be set up in Locata to monitor compliance with PHP completion.</p> <p>Provide further training to staff confirming the purpose of PHPs, this should include the identification of good personal housing plans and what is expected of the officers.</p> <p>Debt advice cases should be included within the quality spot checks currently undertaken to ensure that PHPs are completed within a timely manner and are sent to the applicant.</p>	<p><i>Responsible person / title</i></p> <hr/> <p>Housing Team Manager</p> <hr/> <p><i>Target date</i></p> <hr/> <p>31 March 2020</p>

2. Internal procedures are not consistently documented, communicated and formally reviewed – Control design

Finding

General guidance

The Code of Guidance (CoG) provides a comprehensive framework and practical information on how to apply the legislation. It does not however cover detailed operating processes and internal procedures specific to local systems and ways of working, or provide internal standards for the management of applications. Process notes help to ensure that staff are clear on their responsibilities and expectations of performance and are a tool to refer to where necessary. These should also detail internal performance standards to ensure that applications are progressed in a timely fashion.

We conducted interviews with a Housing Support Officer, a Pathways Officer and a Housing Officer to identify whether any procedure documents and internal standards of service are in place. The Housing Support Officers handle phone calls and triage applications to pass them to either the Housing Officers, who manage the priority cases, or the Pathways Officers, who manage the non-priority cases.

We found that the Housing Support Officers have a set of guidance notes for triaging applications which they rely on when taking phone calls. These contained summary procedures and also summaries of the criteria included within the guidance. Through an interview with the Housing Support Officer we confirmed that this was reviewed and approved by a Housing Officer and has been recently updated to include an additional process. Whilst the Housing Officers are responsible for making the legal decisions on behalf of the Council it is not appropriate for a Housing Officer to sign off on guidance used by the Housing Support Officers. This should be reviewed and approved by the Housing Team Manager to ensure it is accurate.

Housing Officers and Pathways Officers are expected to work primarily from the CoG, but in addition, various supplementary process documents and templates exist e.g. temporary accommodation. These are not however consistently reviewed or maintained in one easily accessible area. There is a need to review the various supplementary process guidance notes, ensure they are up to date, complete and understood.

Service performance standards

In terms of internal performance standards, there are no documented standards in place. The team works towards the statutory timeframes set down within the code of guidance, and these in turn drive the workflow processes in Locata. There are however, no internal standards of service against which performance can be monitored (see Finding 3).

Absence procedures

No agreed process is in place to ensure effective handover of priority cases between Housing Advisers where this is required due to unexpected absence.

Historically, in the event of long term planned absence, a temp has been hired to handle the officer's caseload. In the event of unexpected short term absence, the Duty Officer would be expected to pick up any phone calls and queries in relation to the officer's caseload until such time that the officer returned to work. The Duty Officer is expected to continue managing their own caseload as well as any cases which are urgent and require referral to the Duty Officer. There is an expectation that the Duty Officer will be able to handle this on a short term basis, however this process is undocumented.

Risks / Implications

Staff may not adhere to or have sufficient regard to the Homelessness Code of Guidance, updated case law and good practice as well as local housing conditions.

Without performance standards in place which are adhered to and monitored, applications may not be processed in a timely manner.

Finding rating Action Plan

Medium



- The Housing Support Officer procedure documentation should be reviewed and updated by the Housing Team Manager to ensure it accurately reflects how the service should operate.
- Process notes, templates, and local guidance documentation should be drafted for the Housing Officers and Pathways Officers, incorporating expected performance standards regarding length of time to review a case once allocated and expected times to contact applicants (Finding 3). This should also include expectations for staff when handling cases due to planned and unplanned staff absences.
- Once documented and reviewed, these should be consolidated, communicated and stored in one easily accessible area.
- Internal performance standards in relation to the expected length of time to triage a case should be set (Finding 3).

Responsible person / title

Housing Team Manager

Target date

31 March 2020

3. Lack of service performance standards and delays in progressing cases – Operating effectiveness

Finding

The team works towards the statutory timeframes set down within the Code of Guidance, and these in turn drive the workflow processes in Locata. As noted in Finding 2, there are however, no internal standards of service against which performance can be monitored. Performance standards can be used for monitoring performance flagging any issues where cases may have been missed or the correct process has not been followed. These could include timeframes for initial correspondence to the applicant, and expected timeframes to respond to further correspondence received.

Step 1 - Triage

When an application is received, the application is reviewed by a Housing Support Officer to ensure that sufficient information is provided to confirm that the applicant is eligible for assistance. The application should then be passed to a Housing Office (priority) or Pathways Officer (non Priority) as soon as possible to ensure that any action can be taken to prevent homelessness.

Whilst completing our sample testing of 20 cases, we identified two cases where there was a delay of four and eight days in triaging the case. There was no clear reason for any of these delays.

Step 2 – Case review

When a case is allocated to a Housing or Pathways Officer they should review the information promptly to ensure that the case has been allocated correctly (i.e. priority cases to Housing Officers and non-priority to Pathways Officers) and to progress the case accordingly.


We selected a sample of 10 cases where a decision was made and 10 advice only cases to confirm whether a case review was completed in a timely manner. For 16 cases, both priority and non-priority, a review and correspondence was sent out in a timely manner. We noted the following issues:

- For three cases, two priority and one non-priority, it took a week between the officer being allocated the case and further correspondence being sent to the client confirming that a review had been completed.
- For one non-priority case it was not possible to identify when the officer was allocated the case so we could not confirm the length of time between being allocated and further correspondence being sent out.
- Until correspondence was sent on these cases it was not clear that a review of the applicant's circumstances and case had been completed by the allocated Housing or Pathways Officer. There was no clear reason confirming the reason behind the delay.

Risks / Implications

Where cases are not triaged promptly there is a risk of applicants becoming homeless which could have been prevented.

Where timely reviews are not completed there is a risk that priority cases will be incorrectly allocated and timely action not be taken.

Finding rating	Action Plan	
<p>Medium</p> 	<p>The internal standards of service (see Finding 2) should detail</p> <ul style="list-style-type: none"> the target time between an application being received and allocated to a Housing or Pathways officer. the target time between staff being allocated a case and a review being completed to confirm whether the case is a priority or a non-priority, and to identify subsequent actions to take on the case. If the case is deemed not urgent a note should be left on the case confirming that a review has been completed and further action will be taken in due course. <p>A process should be developed to monitor performance against the specified timeframes and follow up any exceptions.</p>	<p><i>Responsible person / title</i></p> <p>Housing Team Manager</p> <hr/> <p><i>Target date</i></p> <p>31 March 2020</p>

4. The duty rota is not up to date or consistently communicated – Operating effectiveness

Finding

Each day there are three Duty Officers in place; Duty Officer A and B for the Housing Officers (priority) and one for the Pathways Officers (non-priority).

- Duty Officer A will handle priority, urgent cases, with support from Duty Officer B if required.
- The Pathways Duty Officer will handle non-priority, urgent cases.
- Priority cases are those individuals who have higher needs, including those with children.
- Non-priority cases are couples and single individuals who do not have higher needs.
- Urgent cases are those who are likely to be homeless within 14 days.

Duty cases are allocated to the Duty Officer through Locata. Urgent applications requiring duty involvement are allocated straight to the Duty Officer in Locata and appears in their caseload. This is followed up by an email from the Housing Support Officer to the Duty Officer as well as an email that is sent automatically from Locata.

We requested copies of the Housing Officer and Pathways duty rota for November and December 2019 and January 2020. We selected a sample of dates from each rota, totalling 10 from the Housing Officer rotas and five from the Pathway rota and compared the officer on duty as per the rota to the information held in their outlook calendars.


We found that:

- For Duty Officer A, three out of 10 days were not as per the rota. For one of these days the duty officer was confirmed as being on annual leave. An alternate duty officer would have been in place but it was not possible to confirm this without reviewing all officer's calendars.
- For Duty Officer B (backup), three out of 10 days were not as per the rota. For one further day it was noted that the duty officer was confirmed as being Duty Officer but was in training the whole day. The Duty Officer A was in place as per the rota, but if there was an emergency there would have been no backup officer available.
- For the Pathways Duty Officers, two of these five days were not as per the rota.
- The Housing Support Officers are verbally updated on a daily basis about who is in the office and who is the Duty Officer but there is no clear mechanism to ensure the daily Duty Officer is always visible
- When non-urgent cases are allocated to staff, a 'tracker' tool is completed detailing the case and who the case was allocated to. The tracker is not utilised for duty cases so it was not possible to confirm whether cases were allocated to the Duty Officer on the dates in question.

There is a need to clarify the role of the Duty Officers, develop a standard mechanism to allocate them, update for changes, and ensure this is clearly communicated. The tracker should be consistently used for all cases, not just pathways, to ensure visibility of all applications.

Risks / Implications

Where it is not clear who the officer on duty is, priority cases may not be passed to the officer and actioned appropriately. Vulnerable families and individuals may be at risk.

Finding rating	Action Plan	
<p>Medium</p> 	<p>The Assistant Team Manager should place the duty officer rotas in a smartsheet which will be view only. Any amendments should be sent to the Assistant Team Manager and if approved the rota will be subsequently updated.</p> <p>The tracker should be consistently used for all cases, not just pathways, to ensure visibility of all applications. The duty cases should be added to the tracker and management checks can be completed to ensure the duty rota is correct and that staff are not changing their duty days without approval by the Assistant Team Manager to ensure there will always be a Duty Officer A and Duty Officer B working that shift.</p>	<p><i>Responsible person / title</i></p> <hr/> <p>Assistant Team Manager</p> <hr/> <p><i>Target date</i></p> <hr/> <p>28 February 2020</p>

5. Documentation relating to temporary accommodation offers is insufficient – Operating effectiveness

Finding

Where temporary accommodation (TA) is offered, evidence should be retained that an assessment of the availability and suitability has been undertaken. The decision and reasons must be clearly communicated to the applicant. Where the applicant wishes to remain within Aylesbury, but no temporary accommodation is available, the officers should place them out of the area and then should be advised that they will be moved back to the area at the earliest possible date and notes attached to the case to that effect. In order to accept the applicant as homeless, they must have a connection to the area, and accordingly where possible they should be housed within the area.

We selected a sample of 10 cases where a decision was made that a prevention or relief duty was owed to the applicant. Of these, temporary accommodation was arranged in four of the cases. We reviewed what evidence was retained for consideration of the applicant's requirements and whether any reasons were communicated to the applicant.

We found that:

- For one of these cases a note was on file confirming the circumstances of the applicant and why the accommodation was appropriate. This is in accordance with the Code of Guidance
- For one case, the applicant was offered TA outside of the area as there was none available within Aylesbury. As the applicant had a family they were placed urgently, but the applicant was not happy with this decision and it was unclear whether they were informed that the officer will attempt to arrange for closer accommodation, within Aylesbury Vale, as soon as possible. The case was ultimately closed as the applicant was able to begin bidding on social housing.
- For a further case, it was only confirmed that the single adult applicant had been placed in a hotel and no further assessment of availability or suitability was available for review. The case was closed as the applicant was recalled to prison.
- For the fourth case, out of area TA was initially offered but refused as the single adult applicant did not wish to be far from their family. Ultimately this was accepted but it was not clear whether it was discussed that the officer will attempt to arrange for accommodation nearer as soon as possible. They began bidding on social housing and the case was closed.

Risks / Implications

There is a lack of evidence to support the assessment and justification of temporary accommodation placements. Homelessness duties may not be complied with and vulnerable families may remain at risk.

Finding rating Action Plan

Medium



Where temporary accommodation is arranged, a note should be attached to the file confirming the rationale for this, including the assessment of availability and suitability of accommodation with the local area

If accommodation is out of the local area and the applicant is not happy with this, this note should be substantive to confirm the conversation held including whether or not they were advised that they will be moved to closer temporary accommodation as soon as it becomes available.

Responsible person / title

Housing Team Manager

Target date

31 March 2020

Quality spot checks should include reviewing these notes to confirm they are adequate, and raising any repeated instances of non-compliance with staff to identify any training needs.

6. Review the adequacy of safeguarding training for Housing Support Officers – Operating effectiveness

Finding

When applicants first contact the Council by phone they are put through to one of two Housing Support Officers who will either encourage them to complete the online portal or assist them in completing it. They are also responsible for triaging the applications by passing them to either the Pathways Officers or Housing Officers depending on whether the case is a priority or a non-priority. These staff perform a key role in ensuring high risk cases are appropriately flagged and vulnerable individuals protected in line with the Homeless Reduction Act.

AVDC corporate policy is for all staff to complete mandatory safeguarding elearning (Level 1). Some roles are then assessed as requiring level 2, 3, or 4 safeguarding training deepening on the nature of the role. This is indicated in the role profile and is also linked to the requirement to have a Disclosure and Barring Service (DBS) check.

The Housing Support Officer roles are currently assessed as only requiring Level 1 safeguarding training. It was confirmed that both officers had completed the mandatory elearning.

Through discussions and information reviewed during this review, it is recommended that the role of Housing Support Officer be reviewed to determine if it requires any additional safeguarding training over and above the mandatory eLearning.

Risks / Implications

Risks relating to safeguarding needs may not be communicated to the appropriate service. Vulnerable families and individuals may be at risk.

Finding rating

Action Plan

Medium



For the role of Housing Support Officers, which is often the first point of contact with a housing applicant, the role should be reviewed to determine if it requires any additional safeguarding training over and above the mandatory eLearning.

Responsible person / title

Customer Service Manager and Housing Team Manager in consultation with AVDC Safeguarding Lead

Target date

31 March 2020

7. Case load monitoring and quality reviews could be more structured and risk based – Operating effectiveness

Finding

The Locata system and dashboards should be used by the officers to identify tasks and cases that are approaching their deadline, or where the deadline has passed. This is also used by Team Managers to identify the overall case load of the team and the individual caseloads of each officer to confirm whether any action needs to be taken.

The Team Manager advised that the overall case load of the team is monitored to ensure work is allocated appropriately and that any temporary staff are completing their work and not being overwhelmed. There is currently one member of the team who is not being allocated any new cases until their current case load reduces. The monitoring was also discussed with a Housing and Pathways Officer and they confirmed that managers review caseloads informally to ensure cases are allocated fairly.

Individual officer caseload quality checks are currently being completed every two months by the Team Manager and Assistant Team Manager. These are followed by 1-2-1s with staff discussing the outcomes and 'even better if' feedback provided. This provides officers with constructive feedback that they can build on to improve the quality of their work. Notes of the case reviews are scanned onto the Box document system under each officer's folder.

We reviewed the documentation that was held and confirmed that case reviews had been completed with each officer within the homelessness team. These were completed in November and continued into December and then the reviews started again in January. The Team Manager confirmed that due to the number of staff, the January review was likely to run into February. Documentation had been scanned into Box for all reviews. There are currently no internal performance standards in place which are monitored against during these case reviews which would allow for a consistent method of comparison and identifying issues to assist in the performance management of individual officers (as Findings 2 & 3, these should include areas such as initial time taken to contact the applicant and standards which are not impacted by the complexity of the case).

Whilst the case reviews themselves are robust, there is a need for a more systematic, risk based, process to ensure resource is directed most appropriately. For example, inexperienced housing officers may require their work reviewed more frequently; complex cases may require more frequent check-ins at key stages.

Risks / Implications

Excessive workloads may compromise the quality of decisions made; negative impact on team morale. Decisions made are not subject to review or scrutiny, meaning incorrect decisions may go unnoticed.

Finding rating

Action Plan

Low



Quality monitoring checks should be completed on a consistent basis, quarterly as a minimum, and fed back to staff as per current procedures. These reviews can be completed more regularly based on officer performance. This will allow for detailed caseload monitoring to be completed based on the newly implemented service standards on a monthly basis. This will allow for performance management to be completed for individual officers at this time.

Responsible person / title

Housing Team Manager

Target date

31 March 2020

8. Not all documentation is stored on Locata– Operating effectiveness

Finding

Locata should be used for the storage of all documentation including letters, emails, notes, PHP plans and any completed tasks connected to the case.

We selected a sample of 10 advice only cases and 10 homelessness cases where a decision was made, to confirm whether all documentation and notes appeared to be attached to the case.

For the advice only cases, we found that:

- For nine of the cases all documentation to support the decision was attached.
- For one case there was no correspondence attached detailing how the case was passed from the social housing team to the homelessness team.

For the homelessness cases, we found that:

- For eight of the cases all documentation to support the decision was attached.
- For one case a note confirming the contents of a phone call was not attached, however it was noted that an email was sent following up the phone call confirming the conversation had happened.
- For a further case a note confirmed that a chaser email had been sent to another local authority, but a copy of the email was not attached. This case also did not have the required end of duty letter attached. Not sending the end of duty letter means the applicant may not be fully aware that the council's duty has come to an end and how to appeal this decision.

Some of the functionality in Locata could be better used to support good document management. Where notes and documentation is marked as 'important' this will be at the top of the journal section and will no longer be in date order. This is a useful tool to highlight critical pieces of information, but as the case progresses the documentation/notes may no longer be important in the context of the case. These should then be unmarked when no longer required, they would then return to date order.

Risks / Implications

Inadequate documentation may be retained to support decisions and effective handover between officers.

Finding rating Action Plan



The importance of ensuring adequate notes are attached to files should be emphasised to all staff at the next team meeting, with examples of good practice files shared.

It should also be explained that when a document is no longer considered important, it is untagged allowing the documents to return to being in date order.

Responsible person / title

Housing Team Manager

Target date

31 March 2020

Appendix 1. Finding ratings and basis of classification

Report classifications

The overall report classification is determined by allocating points to each of the individual findings included in the report.

Findings rating	Points
Critical	40 points per finding
High	10 points per finding
Medium	3 points per finding
Low	1 point per finding

Overall report classification		Points
●	Critical risk	40 points and over
●	High risk	16– 39 points
●	Medium risk	7– 15 points
●	Low risk	6 points or less

Individual finding ratings

Finding rating	Assessment rationale
Critical	<p>A finding that could have a:</p> <ul style="list-style-type: none"> • Critical impact on operational performance; or • Critical monetary or financial statement impact [quantify if possible = materiality]; or • Critical breach in laws and regulations that could result in material fines or consequences; or • Critical impact on the reputation or brand of the organisation which could threaten its future viability.
High	<p>A finding that could have a:</p> <ul style="list-style-type: none"> • Significant impact on operational performance; or • Significant monetary or financial statement impact [quantify if possible]; or • Significant breach in laws and regulations resulting in significant fines and consequences; or • Significant impact on the reputation or brand of the organisation.
Medium	<p>A finding that could have a:</p> <ul style="list-style-type: none"> • Moderate impact on operational performance; or • Moderate monetary or financial statement impact [quantify if possible]; or • Moderate breach in laws and regulations resulting in fines and consequences; or • Moderate impact on the reputation or brand of the organisation.
Low	<p>A finding that could have a:</p> <ul style="list-style-type: none"> • Minor impact on the organisation’s operational performance; or • Minor monetary or financial statement impact [quantify if possible]; or • Minor breach in laws and regulations with limited consequences; or • Minor impact on the reputation of the organisation.
Advisory	<p>A finding that does not have a risk impact but has been raised to highlight areas of inefficiencies or good practice.</p>

Appendix 2. Terms of reference

The key risks agreed in the Terms of Reference are set out below. Each finding in the report is linked to a key risk from the Terms of Reference.

Sub-process	Risks	Objectives
Strategy and Policy	<p>Staff not adhering to or having significant regard to the Homelessness Code of Guidance, updated case law and good practice as well as local housing conditions</p> <p>The Homelessness Strategy is not in line with the Homelessness Reduction Act.</p>	<ul style="list-style-type: none"> • Strategies and policies and procedures are clear, understood and followed • Strategies and policies support the Homelessness Reduction Act. • The COG is the defining document to which officers should have regard when making homelessness decisions and undertaking investigations
Work allocation and handover	<p>Applications are not processed appropriately</p>	<ul style="list-style-type: none"> • Procedures for allocating priority cases and non-priority cases are clearly documented and consistently adhered to. The use of the “tracker” tool will be reviewed • The role of the Duty Officer is clearly understood and communicated. There is a clear mechanism to ensure the daily Duty Officer is visible. • The Duty Rota information is retained as a matter of audit record. • Expectations of handover between Pathways Officers (Triage) and Housing Advisers are documented on Locata and clearly understood. Roles and responsibilities are clear and consistently applied. • A process is in place to ensure effective handover of priority cases between Housing Advisers where this is required due to unexpected absence.
Record keeping	<p>Inadequate documentation is retained to support decisions</p>	<ul style="list-style-type: none"> • All contact with the applicant is recorded and documented on Locata, this includes emails and notes of any verbal conversations in order to support appropriate judgements and evidence decisions. The audit will assess whether Locata is consistently used as the primary record and if applicable, identify any records maintained outside of Locata.
Case management/ prioritisation	<p>Applications are not processed and progressed in a timely manner</p> <p>Decisions made are not subject to review or scrutiny, meaning incorrect decisions may go unnoticed</p>	<ul style="list-style-type: none"> • Locata, and the workflow processes established in it, is effectively used by Housing Advisers to prioritise their case load. This should ensure priority cases are flagged and overdue actions are identified and progressed. • Housing Advisers evidence they have fully reviewed each case within a defined period of it being allocated to them [x days]; this would help ensure that ‘priority’ cases do not slip through the net at the triage stage. • Processes are in place to review and manage Officer caseload in the event of absence

Quality and performance monitoring	<p>Applications are not processed and progressed in a timely manner</p> <p>Decisions made are not subject to review or scrutiny, meaning incorrect decisions may go unnoticed</p> <p>Excessive workloads compromise the quality of decisions made, negative impact on team morale.</p>	<ul style="list-style-type: none"> • Internal performance standards are in place to ensure that applications are progressed in a timely fashion • Applications are monitored to ensure these are progressed in a timely manner and in line with the Homelessness Reduction Act timeframes and local operational standards. • Systems are in place to easily identify cases that are not progressed in line with performance standards. Routine case load monitoring is capable of identifying inactivity on a case. • Workloads are regularly reviewed to ensure good operational and management practices are not compromised due to excessive workloads. • Documented records of monitoring checks, and any 'case reviews' by senior officers , are kept
Statutory duties	<p>Homelessness and Housing duties are not complied with</p> <p>Vulnerable families and individuals are at risk</p>	<ul style="list-style-type: none"> • The triage process (Pathways) sets out clear criteria which are consistently applied to ascertain whether an application needs to be passed to the Duty Housing Adviser as a priority case (on the day) or put onto the "tracker". • Systems and processes are designed to complement the Act and Code of Guidance to lead officers to a sound judgement before deciding how the case should be progressed. Priority and non priority cases are accurately assessed and appropriately progressed. • Appropriate information is obtained to reach a judgement about the application. Duty for relief or prevention duty is assessed, clearly documented and accepted. • Where a duty is owed, a Personal Housing Plan (PHP) is completed • Where temporary accommodation is offered, there is evidence of appropriate assessment of availability and suitability. Reasons are clearly communicated to the applicant. • All decisions, whether accepted or rejected, are subject to the applicant requesting a review of the decision within 21 days of receipt of the decision letter. • Staff taking telephone calls understand the homelessness duties and that receiving a call can be an applicant making a homeless application. There is clarity over the process when an applicant states they are at risk of and/or homeless vs offer 'advice only' Processes are in place to ensure that the applicant is directed appropriately to the Housing team.
Safeguarding	<p>Risks relating to safeguarding needs are not communicated to the appropriate service.</p>	<ul style="list-style-type: none"> • Any safeguarding concerns are highlighted and communicated in a timely manner to the most appropriate service, with evidence of this communication retained. • All staff have received the required training including staff answering the phones.
Good practice and lesson learning		<ul style="list-style-type: none"> • Good practice is routinely shared across the team and there is an engaging process to ensure lessons are learned.