

# ARGYLL & BUTE COUNCIL

## Internal Audit Section

### INTERNAL AUDIT REPORT

<b>CUSTOMER DEPARTMENT</b>	<b>COMMUNITY SERVICES</b>
<b>AUDIT DESCRIPTION</b>	<b>RISK BASED AUDIT</b>
<b>AUDIT TITLE</b>	<b>Homelessness</b>
<b>AUDIT DATE</b>	<b>January 2016</b>

**2015/2016**



## **1. BACKGROUND**

This report has been prepared as a result of the Internal Audit review of Homelessness within Community Services, Community and Culture as part of the 2015/2016 Internal Audit programme.

Argyll & Bute Council is committed to tackling all forms of homelessness. The Council have developed a Local Housing Strategy 2011-2016, which has the strategic aim “Fewer people will become homeless each year in Argyll & Bute as a result of our proactive approach to prevention and support”. Community and Culture have a Service Outcome: “Less people will become homeless each year in Argyll & Bute as a result of our proactive approach to prevention & support”.

Since 2010 the number of homeless applications has decreased by 46% (a total of 492). Homelessness services work together with housing providers and landlords, and also other services such as employability, mental health, money advice and family mediation services to assist individuals from an early stage, to assist avoiding a housing crisis.

There are 35.5 FTE employees working within Housing Services with a budget of £1.3m for 2014/ 2015.

The primary legislation relating to the provision of homelessness services is the Housing (Scotland Act 1987), as amended by the Housing (Scotland) Act 2001 and the Homelessness etc (Scotland) Act 2003. In November 2012 the Homelessness (Abolition of Priority Need Test) (Scotland) Order 2012 was approved. From 31st December 2012 the priority need test for homeless households was abolished. The 2012 Act removed the distinction between ‘priority’ and ‘non-priority’ homeless households; this means that all unintentionally homeless people are entitled to permanent accommodation. Whether or not someone is found to be intentionally homeless the local authority require to assist to find solutions to the person's homelessness and offer support to address any difficulties that they face.

## **2. AUDIT SCOPE AND OBJECTIVES**

The main objective of the audit was to review compliance with Legislative changes (Dec 2012) in respect of Homelessness and included a review of policies and procedures in respect of system controls and processes, including governance and reporting arrangements.

Control objectives included:

Authority: policies and procedures have been established to ensure compliance with legislation;  
 Occurrence: policies, procedures and processes are documented and are readily available to authorised persons;  
 Completeness: authorities, roles and responsibilities have been identified, allocated, and communicated to the relevant persons and appropriate training provided;  
 Measurement: procedures ensure information is regularly reviewed and updated to reflect any changes in legislation;  
 Timeliness: homelessness records are updated regularly;  
 Regularity: policies and procedures have been established to protect assets from loss, damage and unauthorised access.

### 3. RISKS CONSIDERED

- Failure to comply with legislation;
- Failure to comply with National guidance;
- Failure to adhere to policies and procedures;
- Failure to achieve strategic aims.

### 4. AUDIT OPINION

The level of assurance given for this report is high.

Level of Assurance	Reason for the level of Assurance given
<b>High</b>	Internal Control, Governance and the Management of Risk are at a high standard with only marginal elements of residual risk, which are either being accepted or dealt with.
<b>Substantial</b>	Internal Control, Governance and the Management of Risk have displayed a mixture of little residual risk, but other elements of residual risk that are slightly above an acceptable level and need to be addressed within a reasonable timescale.
<b>Limited</b>	Internal Control, Governance and the Management of Risk are displaying a general trend of unacceptable residual risk and weaknesses must be addressed within a reasonable timescale, with management allocating appropriate resource to the issues.

<b>Very Limited</b>	Internal Control, Governance and the Management of Risk are displaying key weaknesses and extensive residual risk above an acceptable level which must be addressed urgently, with management allocating appropriate resource to the issues.
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This framework for internal audit ratings has been developed and agreed with Council management for prioritising internal audit findings according to their relative significance depending on their impact to the process. The individual internal audit findings contained in this report have been discussed and rated with management.

A system of grading audit findings, which have resulted in an action, has been adopted in order that the significance of the findings can be ascertained. Each finding is classified as High, Medium or Low. The definitions of each classification are set out below:-

<p><b>High</b> - major observations on high level controls and other important internal controls. Significant matters relating to factors critical to the success of the objectives of the system. The weakness may therefore give rise to loss or error;</p> <p><b>Medium</b> - observations on less important internal controls, improvements to the efficiency and effectiveness of controls which will assist in meeting the objectives of the system and items which could be significant in the future. The weakness is not necessarily great, but the risk of error would be significantly reduced if it were rectified;</p> <p><b>Low</b> - minor recommendations to improve the efficiency and effectiveness of controls, one-off items subsequently corrected. The weakness does not appear to affect the ability of the system to meet its objectives in any significant way.</p>
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## 5. FINDINGS

The following findings were generated by the audit:

### **Policies, Procedures and Processes**

- 5.1 Argyll & Bute Council have policies, procedures and processes in place in relation to homelessness which are accordance with the relevant legislation.
- 5.2 The Council has developed a Local Housing Strategy 2011-2016 (LHS). This sets out the Council's overarching vision and five year action plan to address housing needs across all types and tenures of housing in Argyll and Bute and also provides the strategic direction on Homelessness. The full and summary versions of the strategy are available on the Council website.

- 5.3 The Council has developed a Strategic Housing Investment Plan (SHIP). This is available on the Council website. The core purpose of the SHIP is to set out the strategic investment priorities for affordable housing over a 5 year period to achieve the outcomes set out in the LHS, one of which is “fewer people will become homeless each year in Argyll & Bute as a result of our proactive approach to prevention and support” and the aim “to reduce the incidence of homelessness”.
- 5.4 The Council has a Housing Information and Advice Strategy (2011-2016). This is available on the Council website. The 2005 Argyll and Bute Council Housing Information and Advice Strategy focused on the requirements of the Housing (Scotland) Act 2001 for local authorities across Scotland to ensure that effective housing information and advice was provided, particularly in regard to homelessness. The Act states that advice and information about homelessness, prevention of homelessness and any services which may help those who are homeless or threatened with homelessness must be provided free of charge. That duty remains an integral part of this strategy together with the new responsibilities. The Information and Advice Strategy forms a key part of the Local Housing Strategy 2011 – 2016 and contributes towards key local priorities on homelessness reduction.
- 5.5 The Council has developed a prioritisation of needs framework (Housing Support Services) based on the national guidance “Better Futures – A Housing Support Outcomes Framework”. This is set in a context which recognises that the Council has a wide range of statutory duties under Housing Legislation and includes a proactive approach to the prevention of homelessness. Argyll & Bute Council have contracts with three external housing support providers - HELP Project (supporting 16-24 year olds in Bute & Cowal), Kintyre Youth Enquiry Service (supporting 16-24 year olds in Kintyre & Islay) and Carr Gomm (supporting all ages in Mid Argyll, Lorn & the Isles and Helensburgh & Lomond; supporting over 25’s in Kintyre & Islay and Bute & Cowal). Contracts include conditions of confidentiality and data protection. Information for these services is available on the Council website, including useful contacts.
- 5.6 Policies, procedures and processes are documented and are readily available. The statutory Code of Guidance 2005 (The Code) on homelessness provides practical guidance to Local Authorities. This states that local authorities should take a proactive approach to the provision of advice and information. Homeless procedures, including out of hours service information are outlined on the Council’s website and are readily available for members of the public. Information on a wide range of housing related issues is available. This includes information leaflets, links to external organisations, housing associations and useful contact information including out of hours contact details. All information leaflets or publications available online can be requested in another language or format.

- 5.7 The Council is a member of Argyll and Bute Advice Network (ABAN), a partnership of organisations that provide high quality information and advice. Through the members area on the website ABAN members can access the secure, interagency referral system, find information on shared training opportunities, sample policy documents for individual agency use, good practice information, information on the Civil Legal Assistance Office service and also links to potential funding. The website also includes a useful directory of services which is available to the public as well as to ABAN members. The ABAN system is password protected.
- 5.8 Authorities, roles and responsibilities have been identified, communicated to the relevant persons and appropriate training provided. A staff structure is in place for Housing Services.
- 5.9 Training has been provided to staff on a variety of subjects, including, Scottish homelessness, advice & prevention, temporary accommodation and rent deposits.

### **Systems and System Controls**

- 5.10 The Council record all housing related matters (including homelessness) on Abris Nova HX application software suite. The Council's ABRITAS case management system was fully developed and implemented in 2014. This application is hosted remotely by Abris Limited and access is via the internet from users' PCs using standard web browser software. Access rights to ABRITAS, the Council's case management system, are role specific. The employees' role defines a set of menu items and toolbar buttons the users are able to access.
- 5.11 ABRITAS training manuals and users guides have been established, including a Scottish Homeless user's manual. These are readily available and are stored on a shared drive which is accessible to all Housing staff. Training courses have been provided to staff members in the use of ABRITAS.
- 5.12 Homelessness records are updated regularly. The Council's ABRITAS case management system was fully developed and implemented in 2014. This includes the Enhanced Housing Options Module. Client details are keyed directly into the Council's Abris case management system at the time of interview with the clients. Details entered onto Abris are confirmed with the client at the interview allowing them time to make any necessary adjustments.

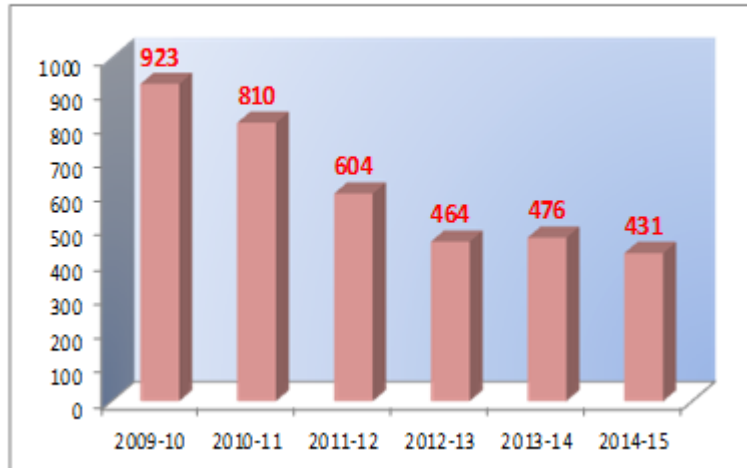
- 5.13 Procedures have been established to protect systems from unauthorised access. This includes data sharing protocols. ABRITAS is password protected. New User passwords or accounts that have been suspended can only be issued with new passwords by the master role which is held by the Housing Services Manager and Housing Systems Co-ordinator. Accounts are automatically suspended by the system at the next logon if there has been no logon for 45 days (+) or if the number of invalid logons exceeds 10. Users change passwords every 45 days.
- 5.14 ABRITAS have provided an Information Security Policy to the Council; this was a requirement of the Tender Submission process. The document summarises the process and standards that ABRITAS use to protect and secure sensitive client information.
- 5.15 The provision of information and advice about housing options in Argyll & Bute is available on the HOMEArgyll website. HOMEArgyll is the common housing register partnership in Argyll & Bute. Its members are Argyll and Bute Council, Argyll Community Housing Association (ACHA), Dunbritton Housing Association, Fyne Homes and West Highland Housing Association. Access to and use of the common housing register modules of the ABRITAS application software suite has been granted to all partners. Security arrangements are in place and a memorandum of understanding between all parties has been signed in 2013.

### **Governance and Reporting Arrangements**

- 5.16 Procedures ensure information is regularly reviewed. Housing Services provide statutory quarterly reporting to the government and to the Housing Management Team. Annual performance reports are produced. In addition there are homeless indicators on Pyramid; this is monitored as one of the key priorities in the Local Housing Strategy.
- 5.17 Argyll & Bute Council along with other Councils attend the ABRITAS Users Group; this provides updates on system developments and provides an opportunity for review.
- 5.18 Monthly audits of homeless cases closed on ABRITAS are undertaken by the Team Leader. This includes compliance checks with agreed target of 28 days for decisions on homelessness to be complete and a review of completeness of case.
- 5.19 Statistical information has been produced for The Local Housing Strategy Annual update 2015. Detailed below are the numbers of homeless applications since 2010. This supports the strategic aim to reduce the incidence of homelessness with an outcome of *'fewer people will become homeless each year in Argyll & Bute as a result of our proactive approach to prevention and*

*support*'. The graph below shows a 46% reduction in homeless applications since 2010, this is taken from the Local Housing Strategy Annual update 2015.

**Total number of homeless applications 2010-2015**



5.20 Monthly budget monitoring meetings are held between finance contacts, the budget Holder the Housing Services Manager and the Housing Systems Co-ordinator. All the Housing budgets, including the Homelessness are discussed at this meeting. Monthly projections are provided on the homelessness temporary accommodation cost centres, these budgets are reconciled to information provided at the start of the financial year. This is discussed at the monthly budget monitoring meetings. The finance contact attends the monthly Housing Management Team meetings where there is a budget monitoring agenda item. Any queries from both a Finance/Housing perspective are discussed and are included in the minutes of these meetings, with action points assigned if necessary.

## 6. CONCLUSION



This audit has provided a high level of assurance. There are no recommendations for improvement identified as part of the audit. Thanks are due to the Housing Services staff and management for their co-operation and assistance during the Audit and the preparation of the report and action plan.



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