Audit Action Update Appendix A

Portfolio: Housing and Community

URN / Priority	Control Issue	Agreed Action / Recommendation (R)	Due Date	Revised Due Date	Service Update to Governance and Audit Committee January 2023
3234	Homelessness & Temporary Accommodation 21/22- A homelessness/Te mporary accommodation policy is not in place.	The response will be delivered in 2 stages –medium and longer term. All actions are assigned to the Service manager to be delegated across team. Medium term (June 2022) Restructure of Housing Support and Homeless Prevention Service and create a specific team for Property Management to take the management of Temporary Accommodation out of the Homeless Team. Restructure has been approved, job descriptions are being devised and recruitment to begin in April 2022. Long Term (Dec 2022) Homelessness Accommodation Policy to be devised which will guide all processes and ensure delivery of all ambitions identified in the soon to be revised Housing Support Programme Strategy which comes in force 1st April 2022.	30-Dec-22	31-Mar-24	Further to the update provided to Governance and Audit Committee in November 2023, further progress is outlined below: Restructure within the Housing & Prevention Service and separation of Temporary Accommodation management from the Homeless Team functions: • Additional Temporary Accommodation Officer now in post and Restructure continues in relation to Job Evaluation Develop Homeless Accommodation Policy • Homeless Accommodation Policy now in place and to be shared with Audit Team for review 17/01/2024.
3237	Homelessness & Temporary Accommodation 21/22- Processes are not adequate to deal with increase in demand.	The response will be delivered in 3 stages – immediate, medium and longer term. All actions are assigned to the Service manager to be delegated across team. Short term (March 2022) SLAs to be introduced between all areas which have a direct impact in service delivery. Including Responsive repairs through FCC, Void Property Turnaround, Cleaning Contracts, Fire Safety Regime	31-Mar-23	30-Jun-24	Further to the update provided to Governance and Audit Committee in November 2023, further progress is outlined below: Develop procedures for repairs and maintenance of Temporary Accommodation and ensure processes in place for: o property inspections repairs for service repairs for landlords health & safety compliance

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		A process to be defined to deal with refused offers of permanent accommodation. A process to be defined to review lease agreements prior to their renewal/expiration date. A process for take on of new properties into the Temporary Accommodation portfolio. Medium term (June 2022) Rental Charge Policy to be define to oversee rent income, arrears and write off. Review the performance information needed for management oversight when the Policy is in place. Longer term (March 2023) The full end to end temporary accommodation process to be mapped to assign roles and responsibilities, identify process delays and inefficiencies as well as document controls.			 Service Level Agreement for Voids Maintenance signed off 08/01/2024 and quarterly review meetings scheduled to monitor adherence and shared with Audit Team 17/01/2023 for review and testing. Procedures and staff guidance notes in place and will be shared with Audit Team w/c 22/01/2024. Develop procedures relating to Void Management for Temporary Accommodation including Service Level Agreement as required with: FCC Housing Assets Service Cleaning contracts Service Level Agreement for Voids Maintenance signed off 08/01/2024 and quarterly review meetings scheduled to monitor adherence and shared with Audit Team 17/01/2023 for review. Procedures and staff guidance notes in place and will be shared with Audit w/c 22/01/2024. Opportunities to engage Newydd as Cleaning Contractor being explored in response to challenges with current provider. Develop procedures relating to Repairs for Temporary Accommodation including Service Level Agreement as required with: FCC Housing Assets Service Cleaning contracts Fire Safety Services Leased Landlords Service Level Agreement for Responsive Repairs now complete and signed off 08/01/2024 and quarterly review meetings scheduled to monitor adherence shared with Audit Team 17/01/2024 for review. Procedures and staff guidance notes in place and will be shared with Audit w/c 22/01/2024.

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					Review reasons for refusal of permanent accommodation and develop process to manage 'unreasonable refusals' Suitability Checklist now in place along with Direct Lets Nomination Form and shared with Audit Team 17/01/2024 for review. Clear process for Homeless Direct Lets now in place with dedicated officer leading the matching process and shared with Audit Team 17/01/2024 for review. Nominations report and suitability assessment requiring management sign off in place and process documented and shared with Audit Team 17/01/2024 for review. Develop clear processes for Renewal and Review of Leases for the Temporary Accommodation portfolio. Process for Renewal of Leases documented and being applied and documents shared with Audit Team 17/01/2024 for review. Review arrangements for "Take On" of FCC and Housing Partners properties for use as Temporary Accommodation through a Memorandum of Understanding or Management Agreement. Memorandum of Understanding for HRA used as Temporary Accommodation to be signed off w.c. 29/01/2024 Discussions with a Housing Partner underway for take on of 10 additional properties for use as Homeless Accommodation and Memorandum of Understanding to signed off if lease offer accepted by 31st March 2024. Develop Policy for Income Management relating to the Temporary Accommodation Portfolio to include:
					Rent CollectionService Charge Collection

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					 Arrears management Income Maximisation and Support Arrears Write Off
					Homeless Accommodation Policy complete with sections on Income Management activity to enable one Policy for all aspects of Homeless Accommodation Management and shared with Audit Team 17/01/2024 for review.
					Develop "Homeless Accommodation – Temporary and Emergency Policy" for the Homeless Service
					 Homeless Accommodation Policy complete and shared with Audit Team 17/01/2024 for review. Changes in process to respond to the Renting Homes Wales Act 2016 already adopted June 2023 for all aspects of Homeless Accommodation Management and shared with Audit Team 17/01/2024 for review.
					Complete full "end to end temporary accommodation process mapping" to assign roles and responsibilities, identify process delays and inefficiencies as well as document controls.
					 To be completed in when all back office system functionality in place. To be completed by end June 2024.
3255	Homelessness & Temporary Accommodation 21/22-	The response will be delivered in the medium term. All actions are assigned to the Service manager to be delegated across	30-Jun-22	31-Mar-24	Further to the update provided to Governance and Audit Committee in November 2023, further progress is outlined below:
	Management information is not				Improve and enhance excel spreadsheet to capture all information in relation to temporary accommodation.
	available or unreliable to monitor the achievement of the Homelessness	Medium term (June 2022) Introduce management information to: Monitor performance timescales at the various stages in Void Management Process. Information to be timely reviewed to identify and address process impediments/ opportunities for			 Spreadsheets updated for data capture and available for Audit Team review end January 2024 Additional tabs on spreadsheets for collection of data relating to Performance Information for length of stay and available for Audit Team review end January 2024

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	Strategy and policy	improvement. Provide oversight of all offers for permanent accommodations, those that were declined and the reason for decline. Oversee length of stays in interim accommodation which is being developed in In-Phase. Oversee rent collection activities. Monitor SLA agreement KPIs.			 Move away from Spreadsheets for accommodation casework and adopt Back Office Migration over to the Back Office system for management of all forms of homeless accommodation to be completed end March 2024 To complete training for all staff working on Back Office functionality for Temporary Accommodation staff once system implemented end of March 2024. Performance Management dashboard scoped out and once functionality of Back Office complete dashboard data will be live end March 2024. Review reasons for refusal of permanent accommodation and develop process to manage "unreasonable refusals". Suitability Checklist now in place along with Direct Lets Nomination Form and shared with Audit Team 17/01/2024 for review. Clear process for Homeless Direct Lets now in place with dedicated officer leading the matching process and shared with Audit Team 17/01/2024 for review. Nominations report and suitability assessment requiring management sign off in place and process documented and shared with Audit Team 17/01/2024 for review. Develop Policy for Income Management relating to the Temporary Accommodation Portfolio to include: Rent Collection Service Charge Collection Arrears management Income Maximisation and Support Arrears Write Off Homeless Accommodation Policy complete with sections on Income Management activity to enable one Policy for all
					Homeless Accommodation Policy complete with sections on Income Management activity to enable one Policy for all

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					aspects of Homeless Accommodation Management and shared with Audit Team 17/01/2024 for review.
3008	SARTH Follow Up 2019/20 - The number of overrides remains high	Management As a sub-regional activity (the Common Allocations Policy operates across Conwy Denbighshire and Flintshire Council areas) it is important that some issues are managed collectively across the SARTH partners as well as at the local level. Overrides is an issue that is a challenge across Conwy Denbighshire and Flintshire. In response to this the Regional Operational Panel for SARTH which meets monthly, reviews levels of overrides to collectively understand the system challenges. Close monitoring at the local level is also a necessary management control. Overrides are part of the allocations matching process but it is acknowledged that when excessive in numbers, this can be an indicator of a bigger problem. Reasons for overrides will usually be 1) inaccurate application data 2) user error when using the system for property matching 3) system specific issues 4) property specific issues. Lengthy waiting times for social housing (27 months was noted in the Audit sample) are predominantly an indicator of limited social housing stock and a disparity between supply of homes and the local housing need. Some applicants will have housing needs that are not easily resolved with the limited supply of social housing available within Flintshire. Examples include:	31-Jul-21	31-Mar-24	Further to the update provided to Governance and Audit Committee in November 2023, further progress is outlined below: Mid-year report (Apr 23 – Sept 23) for Common Housing Register collated by SARTH Regional Compliance Officer and shared with Steering Group on 15/01/2024. Further work required to interrogate overrides. Improved performance in relation to reviews has seen the numbers of applicants on the Common Housing Register reduce from approx. 2400 to approx. 2000 through better data management and cleansing and should reduce overrides due to data quality issues. Evidence to be provided to Audit Team for review and agreed actions to be closed down by end March 2024

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		There are specific challenges around limited 1 bed general needs accommodation.			
		Not all properties will meet the needs of households with disabled adaptations requirements resulting in lengthier waiting			
		times for significantly adapted properties Large families also wait a significant time due to the limited availability of larger family homes (4bed+).			
		Agreed Actions Ensure that there is regional oversight for "overrides" through the SARTH Operational Panel, and that opportunities for service improvement are identified for action at the local level.			
		Explore opportunities for improvements within the Open Housing System to reduce the number of overrides through changes or enhancements to the Allocations Module.			
		Ensure all staff allocating properties via SARTH (FCC and Housing Partners), have regular training on the matching process.			
		When overrides are necessary they should be recorded accurately with reason codes and detailed narrative for justification.			

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3009	SARTH Follow Up 2019/20 - Applicant reviews are not being carried out on a regular basis	Management Response There have been significant resource issues within the Housing Register Team which have posed challenges in terms of service capacity and staff continuity. The periodic review process has therefore fallen behind. This will now be progressed and become routine within the teams approach to register management. Embedding the review process within the Housing Register Team's routine activity and exploring opportunities for utilising technology to create efficiencies within this process are welcomed suggestions and had been on management's radar for areas of service improvement for the Housing Register Team. Management are eager to explore opportunities to embrace technology for processes linked to Housing Register, but also mindful that not all applicants would want to make use of technology for the periodic review process. Striking a balance between efficient processes for the Housing Register Team that make use of technology and support principles of "channel shift" (moving away from telephone contacts as the norm), whilst also retaining a person centred approach will be important when considering the use of technology. Approx. 1 in 4 applicants are "older people" and the use of technology may not be their preferred method of contact. Agreed Actions Embed the periodic review process within	31-Jul-21	31-Mar-24	Further to the update provided to Governance and Audit Committee in November 2023, further progress is outlined below: Periodic reviews are now routinely completed by Housing Register, Connects and Call Centre staff and management information routinely produced (monthly) for purposes of oversight of reviews outstanding. Supporting evidence to be shared with Audit Team for review and close down of agreed actions end January 2024.

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		routine operational practice of the Housing Register Team. Explore opportunities to use technology such as text, and online engagement to assist with the applications and periodic review process. Ensure robust management oversight of periodic reviews through monthly monitoring reports and a clearly documented process.			
3010	SARTH Follow Up 2019/20 - Not all band 1 tenancies have had pre- tenancy checks or landlord references evidenced	Management Response Pre tenancy assessment and a focus on supporting new tenants to start their tenancy on a strong footing are key to achieving sustainable long term housing and reducing the risks of homelessness. The Housing & Prevention Service delivers and commissions a range of housing related support services through Housing Support Grant. Previous tenancy history as evidenced through landlord references is potentially 1	31-Jul-21	31-Mar-24	Those applicants offered social housing via the Homeless Direct Lets nominations process (50% homeless quota) have support needs identified by Homeless Team and are allocated Support Workers as required for move on support to exit homelessness. Support needs captured through Homeless Direct Lets Nominations Form process and sample documents submitted to Audit Team for Review 17/01/2023

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		indicator of an applicant's suitability as a prospective tenant, but it is widely acknowledged that some applicants, particularly those from the Private Rented Sector, will often not want their current landlord to be contacted about their application for rehousing. The fear of "revenge eviction" or creating instability with the landlord tenant relationship is a genuine concern for a great many people so finding other ways to evidence tenancy conduct.			
		Review the pre tenancy approach with SARTH Partners to develop a consistent way of undertaking "pre tenancy checks". Clearly document the outcome of any changes to practice and formalise through a documented procedure Develop an internal transfer's procedure for FCC, which picks up on those applicants who are existing FCC tenants, in order to assess their suitability for a move (not housing need, but picking up on arrears and property condition) as well as helping tenants to prepare for a move. Develop a Tenancy Ready / Home Starter Support Matrix which will identify households who may require additional support with setting up home and managing the practicalities of a move in order to target support services at those with greatest			
3236	Homelessness & temporary Accommodation	support needs Agree in part. A weekly review of temporary accommodation capacity and those	31-Mar-22	31-Mar-24	Review reasons for refusal of permanent accommodation and develop process to manage 'unreasonable refusals'.

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	21/22- Homelessness levels of accommodation are not monitored over time to ensure adequate temporary accommodation is available.	individuals'/families likely to move on (leaving temporary accommodation) takes place. Capacity is increased if required; emergency accommodation can be achieved through booking bed and breakfasts through block booking arrangements. Additional pressures have been observed due to Covid, housing market pressures and the need to increase capacity immediately. Welsh Government Covid Hardship Grant has enabled this as part of the emergency homeless and public health response. It is not possible to accurately forecast homelessness numbers. Trend analysis prior to Covid19 is not applicable and would deliver limited value due to the significant change the pandemic has had on the landscape. Achievement of deliverables in line with the Rapid Rehousing Transition Plan is the ultimate aim. Short term (March 2022) Identification of reasons for refusal of permanent accommodation and action process to manage "unreasonable refusals" to be documented.			 Refusal reasons identified as in significant part due to lack of guidance on Offer Process and inappropriate offers in regards to 'suitability assessment'. Suitability Checklist in place along with Direct Lets Nomination Form Clear process for Homeless Direct Lets now in place with dedicated officer leading the matching process. Nominations report and suitability assessment requiring management sign off in place. Refusals managed through the statutory instrument of Housing (Wales) Act 2014 s.85 Right to Review and Independent Reviewer appointed. COMPLETE AND LIAISING WITH AUDIT TEAM FOR FOLLOW UP TESTING
3256	Homelessness & Temporary accommodation 21/22- The Open Housing system is not being utilised	The response will be delivered in 3 stages – short, medium and longer term. All actions are assigned to the Service manager to be delegated across team. Short term (March 2022)	31-Mar-23	31-Mar-24	As reported to Community, Housing & Assets Scrutiny Committee in October 2023, whilst the initial audit action plan focussed on the implementation of the Open Housing Private Sector Module for the ICT system, other portfolio projects has meant limited ICT resources have been available.

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	to manage stock, tenancies, repair work or rental income to be able to effectively deliver on service objectives.	In the short term, improve and enhance excel spreadsheet to capture all information in relation to temporary accommodation so data can be analysed and interrogated in order to identify efficiencies/opportunities for improvements as well as trends. Medium term (June 2022) Open Housing System Private Sector leasing module is already purchased but not implemented. IT has advised will need to wait for V16 of Open housing and IT capacity means that they will not be able to pick up this project until June 2022 at the earliest. Ensure detailed scope of works and Project Plan adopted. Longer term (March 2023) Implement the new system and all appropriate functionality to manage the Temporary Accommodation Portfolio in regards to all aspects of housing management.			Further consideration was given to how the existing homeless case management system could be utilised to integrate homelessness systems functionality to seamlessly link with the management of temporary accommodation. Significant work has been done to the 'back office' to enable the functionality required by front line staff and to enable case work, management reporting and oversight but further work is required on temporary accommodation. Limited capacity within IT Services has delayed progress. The following is complete or in progress: Improve and enhance excel spreadsheet to capture all information in relation to temporary accommodation. • Spreadsheets updated for data capture • Additional tabs on Spreadsheets for collection of data relating to Performance Information for length of stay • HB Monitoring information linked to TA placements spreadsheets Move away from Spreadsheets for accommodation casework and adopt Back Office • Migration over to the Back Office system for management of all forms of homeless accommodation – commenced May 2023 • Complete training for all Staff working on Back Office functionality for Temp Accom Staff once fully implemented • Performance Management functionality to be developed for reporting via Back Office