Housing, Homelessness and Fair Work Committee

10.00am, Thursday, 29 August 2019

Internal Audit – Homelessness Services – referral from the Governance, Risk and Best Value Committee

Executive/routine
Wards
Council Commitments

1. For Decision/Action

1.1 The Governance, Risk and Best Value Committee has referred the attached Homelessness Services Audit to the Housing, Homelessness and Fair Work Committee for review and scrutiny.

Andrew Kerr

Chief Executive

Contact: Jamie Macrae, Committee Officer

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Referral Report

Internal Audit – Homelessness Services – referral from the Governance, Risk and Best Value Committee

2. Terms of Referral

2.1 The Governance, Risk and Best Value Committee on 13 August 2019 considered a report by the Chief Internal Auditor, Internal Audit Annual Opinion for the year ended 31 March, which detailed the outcome of the audits carried out as part of the Council's 2018/19 Internal Audit annual plan and the status of open Internal Audit findings as at 31 March 2019.

2.2 The Governance, Risk and Best Value Committee agreed:

2.2.1 To note the Internal Audit opinion for the year ended 31 March 2019.

2.2.2 To request that the Chief Executive, Executive Directors and Chief Officer of the Edinburgh Health and Social Care Partnership, supported by the Chief Internal Auditor, report to the relevant Executive Committee at the earliest opportunity and the subsequent Governance, Risk and Best Value Committee setting out clear plans to ensure the closure of all historic and overdue internal audit management actions to enable an improvement to the overall Internal Audit Opinion for 2019/20.

2.2.3 To refer all audits with a red finding to the next meeting of the appropriate Executive Committee for their consideration and that action plans would be reported back to the Governance, Risk and Best Value Committee.

2.3 This report therefore refers the Homelessness Services Audit to the Housing, Homelessness and Fair Work Committee for consideration.

3. Background Reading/ External References

3.1 Internal Audit Annual Opinion 2018/19 – report by the Chief Internal Auditor

3.2 Governance, Risk and Best Value Committee – 13 August 2019 – Webcast

Housing, Homelessness and Fair Work Committee – 29 August 2019

4. Appendices

Appendix 1 – Internal Audit – Homelessness Services

EDINBVRGH
THE CITY OF EDINBURGH COUNCIL

The City of Edinburgh Council
Internal Audit

Homelessness Services

Final Report

8 July 2019

CW1808

Significant enhancements required	Significant areas of weakness and non-compliance in the control environment and governance and risk management framework that puts the achievement of organisational objectives at risk.

Contents

This internal audit review is conducted for the City of Edinburgh Council under the auspices of the 2018/19 internal audit plan approved by the Governance, Risk and Best Value Committee in March 2018. The review is designed to help the City of Edinburgh Council assess and refine its internal control environment. It is not designed or intended to be suitable for any other purpose and should not be relied upon for any other purpose. The City of Edinburgh Council accepts no responsibility for any such reliance and disclaims all liability in relation thereto.

The internal audit work and reporting has been performed in line with the requirements of the Public Sector Internal Audit Standards (PSIAS) and as a result is not designed or intended to comply with any other auditing standards.

Although there are a number of specific recommendations included in this report to strengthen internal control, it is management's responsibility to design, implement and maintain an effective control framework, and for the prevention and detection of irregularities and fraud. This is an essential part of the efficient management of the City of Edinburgh Council. Communication of the issues and weaknesses arising from this audit does not absolve management of this responsibility. High and Critical risk findings will be raised with senior management and elected members as appropriate.

1. Background and Scope

Background

In accordance with the Housing (Scotland) Act 1987 as amended by the Housing (Scotland) Act 2001; the Homelessness Etc. (Scotland) Act 2003; and the Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2004; and the Housing (Scotland) Act 2010, the Council has a legal duty to assist people presenting as homeless or at risk of homelessness.

Homelessness position in Edinburgh

The number of people presenting as homeless to the Council has reduced by 32% over the last decade, from 4,881 applications in 2008/09 to 3,290 in 2018/19. Assisting the homeless, remains a significant challenge for the Council, with 3,061 applicants (93%) assessed as homeless or at risk of homelessness in the last year.

Homelessness cases are assessed and managed by housing officers in localities; temporary accommodation services and the Access Point. Housing officers manage individual cases until the Council's duties have been fully discharged. As at 31 March 2019, there were 24.5 full time equivalent Housing Officers managing a total of 3,876 open homeless cases. Throughout the year caseloads vary per officer from 130 – 190, dependent on demand, resources and absences.

In 2018/19, the average case length for homelessness applications was 365 days, up from 293 days in 2017/18. The Service has advised this increase is due to a lack of permanent or settled housing and increased presentations from private rented sector tenants (up from 17% in 2013 to 24% in 2018).

Advice and Assessment Services

Advice on housing options and the availability of services is provided free of charge at the Council's four locality offices (during office hours); through the customer contact centre (outwith office hours); and via the Council's website. Dedicated services for vulnerable applicants are also available through The Access Point (TAP).

The Council must carry out an assessment to decide if a statutory homelessness duty is owed and must ensure applicants are eligible for assistance and have recourse to public funds. The Council aims to complete its enquiries and inform the applicant of the outcome within 28 days.

The Council must make enquiries and record its decisions in line with the three tests of homelessness, which are as follows:

1. Is the applicant homeless, or threatened with homelessness?
2. Is the applicant intentionally homeless?
3. Does the applicant have a local connection to the City of Edinburgh?

The Council operates a duty appointment system for applicants who are at immediate risk of homelessness or have nowhere to stay that night. An interview should be carried out the same day or temporary accommodation provided until the next available appointment.

The Council also has a duty to inquire whether an applicant (or any other person residing with the applicant) has housing support needs, and where identified, must develop a support plan and make referrals to support services as required. Gold priority can be awarded to people presenting as homeless, should they be assessed as requiring specific housing e.g. ground floor, wet floor shower, or ramped/level access. This is carried out by the advice and assessment service.

Temporary Accommodation

The Council should provide temporary accommodation to applicants who require it, until its statutory duty is discharged. The Council's temporary accommodation consists of furnished flats; bed and breakfast accommodation; shared houses; and hostels.

Under the Homeless Persons (Unsuitable Accommodation) (Scotland) Amendment Order 2017, pregnant women and families can be only be placed in unsuitable accommodation for a maximum of 7 days, unless exceptional circumstances apply. The Council records and monitors any breaches daily, taking action to resolve.

Over the past 12 months the Council has reduced the number unsuitable accommodation breaches from 166 in Q1 2018/19 to 43 in Q2 2019/20. This is a result of a number of initiatives including:

- Allocating an extra 40 council properties for temporary accommodation;
- Investing in extras funding for private sector leasing (PSL) properties; and
- Working with partner Registered Social Landlords (RSLs) to secure a further 75 properties.

Allocation of permanent accommodation

The Council advertises homes available to rent from the EdIndex partnership (the City of Edinburgh Council and 19 Housing Associations) through the online 'Key to Choice' system.

As at 31 March 2019, there were 21,000 applicants on the EdIndex waiting list. Properties are allocated according to the Council's Letting Policy. Statutory homeless applicants are awarded 'Silver Priority, which are ranked by the date silver priority awarded and then by date of application. In 2018/19, circa 1,404 allocations were made to homeless applicants from a total of 3,002 available lettings, with an average of 187 bids per property. The Council lets 7 out of 10 homes to homeless households.

Homelessness case management

Case Management Procedures require Housing Officers to review progress with cases every 12 weeks to confirm that applicants' details remain accurate and they are consistently bidding for available properties.

Processes are also in place for managing 'lost contact' cases'. These are defined as a protracted absence of any sign that a person remains homeless and is actively seeking rehousing by placing bids and maintaining contact with the service.

Quality Assurance

The Council has developed a case management checklist which covers all key areas in the assessment and case management process. Team Leaders required to undertake case file reviews and discuss outcomes at one to one meetings with housing officers.

An audit section is also included within the Homelessness Information System (HIS) database to record the date and name of officer performing the review and any comments regarding the outcomes of the case file review.

Statutory Reporting

The Council is required to report performance and data on statutory homelessness duties and outcomes to the Scottish Government and Scottish Housing Regulator quarterly and annually. Due to known limitations with the Homelessness Information System (HIS) database, data extraction and preparation of reports is a predominantly manual process mainly reliant on one experienced team member, who performs data cleansing checks to ensure the data is complete, relevant and in the correct format in line with documented processes.

Scope

The objective of this review was to assess the adequacy of design and operating effectiveness of the key controls established to ensure the Council meets its statutory homelessness duties, through review of key documents and testing of key processes, and discussions with key members of staff.

We also reviewed a sample of 146 homelessness case files across all four localities for the period 1 April 2018 to 31 December 2018. This included homeless assessment cases; lost contact cases and cases where the applicant had received an offer of permanent accommodation.

Limitations of Scope

The scope of this review was limited to the operational processes in place to ensure the Council meets it statutory homeless duties. The following areas were specifically excluded from the scope of this review:

- Access to out of hours homelessness services – this is included within the scope of the Emergency Prioritisation and Complaints audit.

- Homelessness management strategies - the Council's Rapid Rehousing Transition Plan (RRTP) was approved by the Council's Housing and Economy Committee in March 2019. A review of the RRTP and the supporting delivery framework will be considered within the scope of the Prevention Services review included in the 2019/20 Internal Audit annual plan.

- Whilst this review considered how the Council is meeting its statutory duty to provide interim accommodation, it does not consider the Council's overall approach to use of interim accommodation, as this was subject to review in 2017, and will also be included in the scope of the review above.

Reporting date

Our audit work concluded on 5 June 2019 and our findings and opinion are based on the conclusion of our work as at that date.

2. Executive summary

Total number of findings: 3

Summary of findings raised		
High	1.	Homelessness performance and quality assurance
High	2.	Data quality and performance reporting
Medium	3.	Provision of homelessness advice and information

Opinion

Significant enhancements required

Our review confirmed there are significant control weaknesses in relation to the design and operating effectiveness of key controls established to ensure the Council meets it statutory homelessness duties.

Consequently, two high and one medium rated findings have been raised.

The two High rated findings reflect the need to ensure that appropriate performance standards and measures are established, and an effective first line (service) quality assurance process implemented to provide ongoing assurance that that homelessness policies and procedures are consistently applied across the Council in line with applicable legislation; regulations; Scottish Government and Scottish Housing Regulator expectations; and other relevant internal Council policies.

Whilst management recognises and acknowledges the limitations of the Homelessness Information System (HIS) database use to record and manage homeless applications and is taking appropriate action to replace the system (a project is underway to migrate HIS to the Northgate system). Implementation of the new system has been delayed to September 2020 due to a series of issues related to the build and data loading. A project board is in place to ensure governance and monitoring of the migration and includes representatives from the service area, ICT services and CGI.

To ensure effective security of personal sensitive data stored and processed in the HIS and prevent unauthorised access, it is essential that HIS user access profiles are reviewed and updated to ensure that all users have unique user log on IDs and passwords, and that a data protocol is designed; implemented; and monitored as part of the quality assurance process to support accurate recording, processing, and extraction of homelessness data. These interim measures should improve compliance with General Data Protection Regulation (GDPR) requirements until the new Northgate system is implemented.

Whilst homelessness service operational performance is reported to senior management, there is currently no performance reporting provided to the Council's Housing and Economy Committee, although management has advised that this is currently under development. Additionally, limited performance information is reported publicly to customers, in comparison to other Scottish Local Authorities.

The medium rated finding highlights the importance of ensuring that appropriate and timely information and advice is available through multiple communication channels to help people and / or their advocates make the right choices to address their housing situation. If customers can access relevant information at the right time, this should reduce the extent of initial contact and support required from the Council, alleviating demand and pressures on the Homelessness service.

Our detailed findings and recommendations are included at Section 3 below.

Management response

Management acknowledge the issues raised during the audit and will commit to implementing improvement actions to address these. The Homelessness Service is facing increasing pressure with a lack of affordable housing options and move on accommodation available for applicants presenting in Edinburgh. This has resulted in a significant increase in Housing Officers workload due the extremely high number of open homelessness cases and the increase in average time taken to rehouse an applicant in to permanent accommodation. Average Housing Officer caseload is between 130-190 cases, which impacts ability to carry out the full requirements of our case management procedures effectively.

There are over 3,000 homeless households that apply to the Council each year for whom it has a duty to find a settled home. The number of homeless applications has been decreasing due to the Council and its partner's extensive homelessness prevention work, but pressure on temporary housing is increasing with people spending longer in temporary accommodation due to the length of homeless cases. This is caused by the limited settled housing options relative to the scale of demand.

The housing market pressure experienced in Edinburgh is fundamentally different to any other housing market in Scotland. This has led to high housing costs, high need for affordable housing, and high unmet need, which has a significant impact on the ability to rehouse homeless households. Household income inequality is growing, and the already pressured housing market is expected to be under increasing pressure as the city grows at a faster pace than elsewhere in Scotland.

The following issues are also impacting demand for services:

- Between 2016-2026 the population of Edinburgh will increase by 7.7%, double the projected growth rate for the whole of Scotland at 3.2%, and household population is projected to increase by 11.5%, almost twice the projected increase of 6.4% for Scotland as a whole.

- Demand for new homes in Edinburgh is between 38,000 and 46,000 over the next ten years, of which over 60% needs to be affordable.

- Only 15% of Edinburgh's overall housing stock is available for social rent, compared to Scottish average of 25%.

- Private rents in Edinburgh average over £1,000 a month, this well above current Local Housing Allowance and is not affordable for a majority of applicants; the national average is £800.

- In 2017/18, around 800 people presented as homeless from a private rented sector tenancy, a customer group that has begun to increase year on year.

- Increased loss of private rented sector properties to the short term lets market.

- To buy a home in Edinburgh costs over 6 times the average income.

- 111% of all social lets in Edinburgh would be required to meet all homeless needs through the social rented sector, i.e. even if all available social lets are to homeless households there would still be a supply gap and it would not allow for needs of other priority groups to be met.

- The Council's Business Plan 2017-2022 includes a commitment to deliver 20,000 affordable homes by 2027; one of the largest council-led house building programmes in the UK. There is a significant shortfall of settled housing available for all housing needs groups in Edinburgh.

3. Detailed findings

1. Homelessness performance and quality assurance	High

Our review of existing homelessness policies, procedures and operational processes established that:

1.1 <u>Homelessness policies and procedures</u>

- **Review of policies and procedures** - a range of policies and procedures aligned to best practice and relevant legislation are in place, but have not been subject to regular review, with several last reviewed in 2013/14;

- **Standard templates** – are not used to ensure the format of policy and procedures documentation is consistent and subject to appropriate version control;

- **Local interpretation of policies and procedures** – Locality Team Leaders issue instructions via email that result in local interpretation of policies and procedures; inconsistent application; and variances in approach; and

- A **'Housing Options Protocol for Care Leavers'** was drafted and shared with the Council's Young People's Services in January 2019, however, feedback is yet to be received to allow the protocol to be finalised, implemented and communicated.

Management has advised that a review of all policies and procedures is currently in progress and due to be completed by 30 September 2019.

1.2 <u>Homelessness Operational Processes</u>

- **Records Management and retention –** paper case files could not be located for 17 cases chosen as part of our sample. Business Support advised these files were not recorded as archived.

- **Average appointment waiting times** where emergency assistance was not required was 11.6 working days in 2018/19. The average waiting time has subsequently increased, averaging 21.9 working days in March. Management has advised this is due to staff absence and mandatory training for new ICT system, including the delivery by officers.

- **Capacity** - Housing Officers advised that limited capacity is available to manage cases in line with the timescales set out in the Council's procedures. It was noted the average caseload per officer was 138 cases. Management advised that, officers generally have one day per week for casework, which makes providing support to all cases challenging so prioritisation from officers is on a case by case by case basis.

- **Homelessness assessments** reportedly often take longer than the allocated one-hour slot, resulting in multiple interviews; which impacts waiting times;

- **Duplication of effort when recording information** - for example, taking handwritten notes in interviews, and then transferring to system (laptops and computers are available for use during interviews);

- **Completion of Action Plans** following interview, rather than during the interview with the applicant;

- **Inconsistent approach to scheduling regular reviews** - for example using calendar reminders or Excel logs**,** with a number of officers managing caseloads through paper lists.

- **Eligibility checklists and applicant identification –** only 72% of cases files (59 of 82 cases) sampled had completed eligibility checklists and copies of applicant identification on file, to evidence that the applicant was eligible for assistance and had recourse to public funds;

- **Recording applicant circumstances**, **advice given and final decision** - 21% (17 of 82 cases) of case files did not include a clear record of the applicant's circumstances; the advice given; and the reason for the Council's final decision;

- **Application of the 'Three Tests of Homelessness'** - 11% of case files (9 of 82 cases) could not evidence that the Council had considered and documented in sequence, its decisions in line with the 'Three Tests of Homelessness';

- **Applicant declaration** – applicants are required to sign a declaration pro-forma to demonstrate they understand their legal duty to disclose accurate information. Testing found the pro-forma was only completed in 2% of cases (2 of 82 cases) reviewed. Housing Officers advised this was due to ambiguity on whether the proforma meets the requirements of the General Data Protection Regulations (GDPR).

  Consultation with the Council's Information Governance Unit, and Legal department confirmed that the declaration proforma should be revised;

- **Action plans** - evidence of completed action plans that were provided to the applicant was available in only 24% of the case files (20 of 82 cases) reviewed;

  Housing Officers advised that some action plans had been emailed to applicants, however we were unable to confirm as this was not noted on the electronic file, or a copy of the email retained in the paper case file;

- **Written decision letters** – there was no evidence of copies of decision letters for 20% of case files (16 of 82 cases) reviewed;

- **12 weekly case review process** - for 96% of cases (79 of 82 cases), there was no evidence to demonstrate the housing officer had regularly followed the Council's 12 weekly case review process. with several instances of limited contact for periods of 6 to 12 months.

- **Lost contact -** in 72% of cases (23 of 32 closed cases sampled), housing officers did not consistently follow the Council's 'Lost Contact' procedures to ensure all efforts were made to contact applicants prior to closing their case, again with several instances of no contact attempts being made for 6 to 12 months.

- **Pre-allocation advice and support** - in 87% of cases (13 of 15 cases sampled), there was limited evidence to demonstrate the housing officer had contacted the applicant to provide pre-allocation advice and support, prior to an offer of permanent accommodation.

1.3 Quality Assurance

Our sample testing across 82 case files found no evidence of completion of case file reviews, with no documentation retained on file, and the audit section on Homelessness Information System (HIS) database incomplete.

We also reviewed a system report which recorded completion of the audit section on HIS and noted the audit field had not been complete on any case files since February 2017.

Risks

- Housing officers are not operating in line with the Councils policies and procedures;

- Failure to meet statutory and regulatory duties in relation to homelessness;

- Assistance may be provided by applicants who are not eligible, and with no recourse to public funds;

- Applicants who need to wait up to four weeks for an appointment may be provided with insufficient information to prevent homelessness occurring or reoccurring for example, where a customer is served a two-month Notice to Quit/Section 33 notice by a landlord;

- Applicants are not aware of their legal duty to disclose accurate information;

- Inaccurate record keeping for evidencing decision making and to support statutory appeals;

- Non-compliance with records management policies and General Data Protection Regulations (GDPR);

- Applicants are not aware of decision outcome and their legal right to appeal; and

- Inability to demonstrate the applicant was provided with relevant information, such as benefits advice and support; to help sustain their tenancy and prevent repeat homelessness.

1.1 Recommendations: Policies and procedure framework

Management have advised all policies and procedures are currently being reviewed. As part of that review the following should be considered:

1. A policy and procedure review schedule should be developed and maintained to ensure all documents are reviewed at least every three years or earlier where required due to legislative or operational changes;

2. Use of a standard template for all policies and procedures to ensure all documents:

   - Clearly state the Title of the document and whether it is a policy, procedure or process note;

   - Clearly state how the policy or procedure ensures compliance with applicable legislation;

   - Include a Version Control table, stating creation date; version number; policy owner and date next review due;

   - Include within the footer, the title, date and version number; and

   - Appendix to reference links to other relevant policies and procedures.

3. All policies and procedures should be stored in a controlled and centrally managed location, with clear responsibilities for reviewing and updating documents, and previous versions should be archived;

4. Implementation of a protocol for communicating updates to policies and procedures by a Senior Officer only, to ensure consistent application of policies and procedures across all localities and other offices; and

5. The Housing Options Protocol for Care Leavers should be finalised in conjunction with Young People's Services; approved and communicated.

Agreed Management Actions

1. A full policy and procedure review schedule will be developed and maintained to ensure all documents are reviewed at least every three years or earlier where required due to legislative or operational changes. An initial review of all policies and procedures will take place this year.

Owner: Alistair Gaw, Executive Director of Communities and Families **Contributors:** Jackie Irvine, Head of Safer and Stronger Communities; Nicky Brown, Homelessness and Housing Support Senior Manager; Debbie Herbertson, Homelessness Services Manager; Brian Stewart, Homelessness Services Manager; Nichola Dadds, Senior Executive Assistant	**Implementation Date:** 31 January 2020

2. Agreed, the recommendation will be implemented in full.

Owner: Alistair Gaw, Executive Director of Communities and Families **Contributors:** Jackie Irvine, Head of Safer and Stronger Communities; Nicky Brown, Homelessness and Housing Support Senior Manager; Debbie Herbertson, Homelessness Services Manager; Brian Stewart, Homelessness Services Manager; Nichola Dadds, Senior Executive Assistant	**Implementation Date:** 31 January 2020

3. Agreed, the recommendation will be implemented in full.

Owner: Alistair Gaw, Executive Director of Communities and Families **Contributors:** Jackie Irvine, Head of Safer and Stronger Communities; Nicky Brown, Homelessness and Housing Support Senior Manager; Debbie Herbertson, Homelessness Services Manager; Brian Stewart, Homelessness Services Manager; Nichola Dadds, Senior Executive Assistant	**Implementation Date:** 31 January 2020

4. The Service Manager will implement a protocol for communicating updates to policies and procedures relating to Homelessness Prevention and Housing Options Team, to ensure consistent application of policies and procedures across all localities and other offices

Owner: Alistair Gaw, Executive Director of Communities and Families **Contributors:** Jackie Irvine, Head of Safer and Stronger Communities; Nicky Brown, Homelessness and Housing Support Senior Manager; Debbie Herbertson, Homelessness Services Manager.	**Implementation Date:** 30 September 2019

5. We will, in conjunction with Young People's Services, finalise the Housing Options Protocol for Care Leavers. It will be approved by the Council's Housing, Homelessness and Fair Work Committee and communicated by the end of this financial year.

Owner: Alistair Gaw, Executive Director of Communities and Families **Contributors:** Jackie Irvine, Head of Safer and Stronger Communities; Nicky Brown, Homelessness and Housing Support Senior Manager; Scott Dunbar, Looked After Children Senior Manager; Debbie Herbertson, Homelessness Services Manager; Steve Harte, Young People's Services Team Manager; Nichola Dadds, Senior Executive Assistant	**Implementation Date:** 30 April 2020

1.2 Recommendations: Review of appointment waiting times and increased efficiencies

The current appointment system should be reviewed with the aim of reducing appointment waiting times for non-emergency applicants. In doing so, management should consider

1. Introducing measures to provide applicants with relevant information at the time of first contact; whether that is in person or on the telephone. This should include:

   - Working with Customer Service and Business Support staff to ensure applicants are advised what documents they will be required to bring to their interview;

   - Review of current interview processes and time allocated to identify where efficiencies can made, for example through better use of technology, to allow assessments to be complete in one appointment in the majority of cases;

   - Early intervention for applicants threatened with homelessness within two months to enable the Council to take steps to prevent the homelessness occurring where possible.

2. Introduction of a service standard for conducting interviews within a specified number of days from point of initial contact, with associated performance monitoring and reporting to management in place.

Agreed Management Actions

1. Staff will provide relevant information at initial point of contact, whether that is in person or on the telephone.

   A script will be provided for Customer Service and Business Support staff to ensure that that applicants are advised on the documents they are required to bring to their interview; a follow up appointment letter will also clarify what documentation is required when attending appointment.

   Current interview processes and time allocated will be reviewed to identify where efficiencies can be made. This will involve reviewing the current interview space availability and the use of technology to support staff to complete assessments in one appointment wherever possible.

   The continued delivery of early intervention and prevention work will be supported through the review of processes and the service is currently recruiting four additional officers, to ensure increase capacity to deliver high quality prevention work.

Owner: Alistair Gaw, Executive Director of Communities and Families Contributors: Jackie Irvine, Head of Safer and Stronger Communities; Nicky Brown, Homelessness and Housing Support Senior Manager; Debbie Herbertson, Homelessness Services Manager; Nichola Dadds, Senior Executive Assistant	Implementation Date: 31 January 2020

2. Agreed, a service standard for conducting interviews within 14 days from point of initial contact will be introduced, with associated performance monitoring and reporting to management put in place.

Owner: Alistair Gaw, Executive Director of Communities and Families Contributors: Jackie Irvine, Head of Safer and Stronger Communities; Nicky Brown, Homelessness and Housing Support Senior Manager; Debbie Herbertson, Homelessness Services Manager; Nichola Dadds, Senior Executive Assistant	Implementation Date: 31 October 2019

1.3 Recommendations: Review of legal duty to disclose declaration

1. The legal declaration proforma should be revised in consultation with the Council's Information Governance Unit and Legal department to ensure it accurately sets out the applicant's legal duties and any action which could be taken in line with relevant legislation; the Homelessness Code of Guidance; and General Data Protection (GDPR) regulations. The form should be regularly reviewed in line with the policy review schedule (refer recommendation 1.1) to ensure it remains up to date;

2. Housing officers should ensure all applicants are advised of their legal duties and a copy of the signed declaration should be retained within the case file. Completion of legal declarations should be checked as part of Case files reviews.

Agreed Management Actions

1. Agreed, the recommendation will be implemented in full.

Owner: Alistair Gaw, Executive Director of Communities and Families Contributors: Jackie Irvine, Head of Safer and Stronger Communities; Nicky Brown, Homelessness and Housing Support Senior Manager; Debbie Herbertson, Homelessness Services Manager; Nichola Dadds, Senior Executive Assistant	Implementation Date: 31 October 2019

2. Housing Officers will ensure that all applicants are advised of their legal duties and a copy of the signed declaration will be retained within the case file. Completion of legal declaration will be checked as part of case file reviews.

Owner: Alistair Gaw, Executive Director of Communities and Families Contributors: Jackie Irvine, Head of Safer and Stronger Communities; Nicky Brown, Homelessness and Housing Support Senior Manager; Debbie Herbertson, Homelessness Services Manager; Nichola Dadds, Senior Executive Assistant	Implementation Date: 31 October 2019

1.4 Recommendations: Monitoring compliance with policies and procedures

1. A communication should be issued to all Housing Officers and Business Support staff to remind them of their responsibility for managing and storing records including electronic files and emails. Communication should include links to the Council's Records Management Policy, Retention Schedule and Records Management factsheets available via the Orb.

2. A communication should be issued to all Team Leaders and Housing Officers to reinforce the requirement to comply with the Council's policies and procedures and advise that ongoing

compliance with policies and procedures will be monitored and reported.

3. A regular case file review process for new assessments; open cases; and closed cases should be implemented to monitor compliance with policies and procedures and identify any training and development needs.

   The process should be documented and should include, but not be limited to the following:

   - clearly defined roles and responsibilities for the both senior officer performing the case file review, and the housing officer managing the case;

   - defined frequency and sample size of case file reviews to be performed;

   - appropriate coverage of team members, with focus on new team members, or those where results of previous case file reviews indicate that improvement is required;

   - requirement to document completion of the case file review using the Case Management Checklist;

   - requirement to record the date; name of officer carrying out the case file review; and a summary of the review outcomes and subsequent actions to be taken within the 'Audit' section of the Homelessness Information System (HIS) system;

   - retention of completed checklist within the case file;

   - process for addressing follow-up actions; and

   - monitoring and reporting arrangements, including any significant and / or systemic themes identified that need to be addressed.

4. Compliance with policies and procedures should be a performance objective for all Team Leaders and Housing Officers. Completion of case file reviews and outcomes should be discussed at regular performance meetings and annual looking back/forward conversations. Any training needs identified should be recorded and addressed, and improvement actions clearly set out.

Agreed Management Actions

1. Agreed, a communication will be issued to all Housing Officers and Business Support staff to remind them of their responsibility for managing and storing records including electronic files and emails. Communication will include links to the Council's Records Management Policy, Retention Schedule and Records Management factsheets available via the Orb.

Owner: Alistair Gaw, Executive Director of Communities and Families **Contributors:** Jackie Irvine, Head of Safer and Stronger Communities; Nicky Brown, Homelessness and Housing Support Senior Manager; Debbie Herbertson, Homelessness Services Manager; Nichola Dadds, Senior Executive Assistant	**Implementation Date:** 30 September 2019

2. A communication will be issued to all Team Leaders and Housing Officers to reinforce the requirement to comply with the Council's policies and procedures and advise that ongoing compliance with policies and procedures will be monitored and reported.

Owner: Alistair Gaw, Executive Director of Communities and Families **Contributors:** Jackie Irvine, Head of Safer and Stronger Communities; Nicky Brown, Homelessness and Housing Support Senior Manager; Debbie Herbertson, Homelessness Services Manager; Nichola Dadds, Senior Executive Assistant	**Implementation Date:** 30 September 2019

3. Agreed, the recommendation will be implemented in full.

Owner: Alistair Gaw, Executive Director of Communities and Families **Contributors:** Jackie Irvine, Head of Safer and Stronger Communities; Nicky Brown, Homelessness and Housing Support Senior Manager; Debbie	**Implementation Date:** 31 October 2019

Herbertson, Homelessness Services Manager; Nichola Dadds, Senior Executive Assistant	
4. Agreed, the recommendation will be implemented in full.	
Owner: Alistair Gaw, Executive Director of Communities and Families **Contributors:** Jackie Irvine, Head of Safer and Stronger Communities; Nicky Brown, Homelessness and Housing Support Senior Manager; Debbie Herbertson, Homelessness Services Manager; Nichola Dadds, Senior Executive Assistant	**Implementation Date:** 30 November 2019

2. Data quality and performance reporting	High

The Homelessness Information System (HIS) database contains significant amounts of personal sensitive information in relation to homeless applicants.

Management acknowledges that there are limitations with the Homelessness Information System (HIS) database use to record and manage homeless applications and has advised that whilst a project to migrate HIS to the Northgate system commenced in 2015, implementation has been delayed to September 2020 due to a series of issues related to the build and data load of the new system.

Our review identified a number of areas where the quality and accuracy of data recorded in and reported from HIS requires improvement:

- **user access profiles -** system users do not use unique usernames and passwords to access the database. Furthermore, the same shared username and password has been used to access the system since circa 2011 and is documented within the HIS user manual;

- **case records** - can be accessed and amended by all users and no audit trail is in place to record any changes made and by whom;

- **data fields** - can be bypassed data and incomplete or inaccurate data entered; and

- **electronic records** - are not destroyed within 5 years in line with the Council's records retention schedule, with system records dating back to 2002.

The requirement to cleanse and audit the data in HIS was also raised in a previous internal audit in 2017 on Short Term Homelessness provision. This finding is outstanding pending migration to Northgate.

Service Standards and public performance reporting

Whilst the Council has publicised high level figures such as reductions in homelessness presentations due to housing options and prevention advice, it does not regularly report performance information relating to homelessness service provision and outcomes to its customers. In addition, there are no Service Standards setting out what customers can expect from the service in terms of timescales and how the Council is performing against these.

A review of other local authorities including Glasgow City Council, Perth and Kinross Council, West Dunbartonshire Council and South Lanarkshire Council noted regular performance reporting and established Service Standards in place.

Committee Reporting

The Council does not currently report homelessness and housing options performance information to the Housing and Environment Committee. Management has advised that a suite of performance

measures and reporting is currently under development and proposals will be presented to the Committee in August 2019.

Risks

- Potential non-compliance with General Data Protection Regulations (GDPR) Article 5(1)(f) and Article 32 in relation to information security and security of processing;
- Potential non-compliance with the Council's internal information governance policies;
- The Council cannot rely on the quality and accuracy of data collected and reported both internally and externally as reflected in the specific findings in this audit;
- Inaccurate data recording on service needs, demand and outcomes may impact informed decision making on service delivery, investment and funding;
- The Council cannot provide assurance it is providing an efficient and effective statutory service.

2.1 Recommendations: Improving data quality and accuracy of reporting

1. A review of HIS user access profiles and rights should be completed to control access to the system. Where possible unique user log on IDs and passwords should be provided for all users, with a requirement to change passwords on a regular basis;

2. An interim 'Data Protocol' should be established and implemented until the migration of data from the Homelessness Information System to Northgate is completed, with the objective of controlling input and processing of homelessness data in the HIS and reducing interim data quality issues. The protocol should set clear rules in relation to the quality, format, and completion of data input and processed;

3. Data input quality checks should also form part of regular case file reviews as set out in recommendation 1.4;

4. A risk-based approach should be taken and documented to determine if data quality checks will be performed on historic data held within the system; and

5. Records held within HIS should be managed within the Council's Records Retention Policy and Schedule. This should a detailed plan for destruction of records over 5 years old.

Agreed Management Actions

1. Unique user log on IDs and passwords will be provided for all users, with a requirement to change passwords on a regular basis to improve system security.

Owner: Alistair Gaw, Executive Director of Communities and Families **Contributors:** Jackie Irvine, Head of Safer and Stronger Communities; Nicky Brown, Homelessness and Housing Support Senior Manager; Emma Morgan, Senior Change and Delivery Officer; Debbie Herbertson, Homelessness Services Manager; Nichola Dadds, Senior Executive Assistant	**Implementation Date:** 31 January 2020

2. An interim 'Data Protocol' will be established and implemented until the migration of data from the Homelessness Information System to Northgate is completed, with the objective of controlling input and processing of homelessness data in the HIS and reducing interim data quality issues. The protocol will set clear rules in relation to the quality, format, and completion of data input and processed.

Owner: Alistair Gaw, Executive Director of Communities and Families **Contributors:** Jackie Irvine, Head of Safer and Stronger Communities; Nicky Brown, Homelessness and Housing Support Senior Manager; Emma Morgan,	**Implementation Date:** 31 January 2020

Senior Change and Delivery Officer; Debbie Herbertson, Homelessness Services Manager; Nichola Dadds, Senior Executive Assistant	

3. Data input quality checks will also form part of regular case file reviews as set out in recommendation 1.4.

Owner: Alistair Gaw, Executive Director of Communities and Families **Contributors:** Jackie Irvine, Head of Safer and Stronger Communities; Nicky Brown, Homelessness and Housing Support Senior Manager; Emma Morgan, Senior Change and Delivery Officer; Debbie Herbertson, Homelessness Services Manager; Nichola Dadds, Senior Executive Assistant	**Implementation Date:** 31 January 2020

4. Agreed, a risk-based approach will be taken and documented to determine if data quality checks will be performed on historic data held within the system.

Owner: Alistair Gaw, Executive Director of Communities and Families **Contributors:** Jackie Irvine, Head of Safer and Stronger Communities; Nicky Brown, Homelessness and Housing Support Senior Manager; Emma Morgan, Senior Change and Delivery Officer; Debbie Herbertson, Homelessness Services Manager; Nichola Dadds, Senior Executive Assistant	**Implementation Date:** 31 January 2020

5. Records held within HIS will be managed within the Council's Records Retention Policy and Schedule. The ongoing management and deletion of historical records will form part of the data cleansing project as HIS migrates to Northgate.

Owner: Alistair Gaw, Executive Director of Communities and Families **Contributors:** Jackie Irvine, Head of Safer and Stronger Communities; Nicky Brown, Homelessness and Housing Support Senior Manager; Emma Morgan, Senior Change and Delivery Officer; Debbie Herbertson, Homelessness Services Manager; Nichola Dadds, Senior Executive Assistant	**Implementation Date:** 31 October 2020

2.2 Recommendations: Service Standards and performance reporting

1. The Council should consider developing Service Standards which set out what customers can expect the Council in relation to homelessness advice and assistance. Service Standards should be SMART (specific; measurable; achievable; relevant; time bound; and evaluated regularly) and clearly defined. Suggestions for Service Standards include, but should not be limited to:

   - appointment waiting times

   - % assessment decisions with 28 days

   - % applicants provided with temporary accommodation

2. The Council should report performance information in relation to Service Standards and key homelessness outcomes regularly on the Council's website and other forums such as social media; and

3. Proposals for performance reporting to the Housing and Economy Committee should consider (but not be restricted to) monitoring areas highlighted in finding 1; performance against agreed service standards (if implemented), compliance with applicable regulations, policies, and procedures; and data quality protocols.

Agreed Management Actions

1. We will develop Service Standards which set out what customers can expect in relation to homelessness advice and assistance. Service Standards should be SMART (specific; measurable; achievable; relevant; time bound; and evaluated regularly) and clearly defined. Proposed Service Standards include:

- appointment waiting times
- % assessment decisions with 28 days
- % applicants requiring and eligible for temporary accommodation receiving an offer

Owner: Alistair Gaw, Executive Director of Communities and Families **Contributors:** Jackie Irvine, Head of Safer and Stronger Communities; Nicky Brown, Homelessness and Housing Support Senior Manager; Debbie Herbertson, Homelessness Services Manager; Nichola Dadds, Senior Executive Assistant	**Implementation Date:** 30 November 2019

2. We will report performance information in relation to Service Standards and key homelessness outcomes regularly on the Council's website and other forums such as social media

Owner: Alistair Gaw, Executive Director of Communities and Families **Contributors:** Jackie Irvine, Head of Safer and Stronger Communities; Nicky Brown, Homelessness and Housing Support Senior Manager; Emma Morgan, Senior Change and Delivery Officer; Debbie Herbertson, Homelessness Services Manager; Nichola Dadds, Senior Executive Assistant	**Implementation Date:** 31 March 2020

3. We will report performance information through a dashboard to the Housing and Economy Committee, officers are currently working with elected members to finalise the key performance indicators required.

Owner: Alistair Gaw, Executive Director of Communities and Families **Contributors:** Jackie Irvine, Head of Safer and Stronger Communities; Nicky Brown, Homelessness and Housing Support Senior Manager; Emma Morgan, Senior Change and Delivery Officer;	**Implementation Date:** 31 January 2020

3. Provision of homelessness advice and information	**Medium**

Review of homelessness information, advice, and support provided by the Council noted the following areas where this could be improved:

Homelessness Webpages

The Council's webpages include only basic information relating to homelessness, such as contact details for locality offices and out of hours assistance. Limited information is provided on the range of homelessness services provided by the Council such as housing options, homelessness assessments and temporary accommodation. The website does not detail and signpost customers to other support and advice agencies who may be able to offer specialist help and assistance.

Additionally, the Council's website does not provide information for landlords and creditors (such as mortgage providers) on their legal duty to disclose any actions or proceedings which may put a household in the City of Edinburgh area at risk of homelessness in line with Section 11 of the Homelessness Etc (Scotland) Act 2003.

During our review management provided updated website content which is currently in draft. The service is currently working with Customer and Digital Services to progress this.

Information Leaflets

The Council provides a range of leaflets relating to Homelessness and Temporary Accommodation including how an applicant can keep in touch; how to bid on property; advice of storage or property and guidance on priority status.

Review of the leaflets confirmed that they only provide further advice to those who have already contacted the service for assistance, with limited written information available to those contacting the service for the first time.

Self-serve facilities

Customers who require housing options advice and information from the Council must attend an interview in person during office hours. No facility is currently available to allow applicants to receive advice and information based on their circumstances at a time convenient to them.

As part of our review, we considered information provided by other local authorities, and note a number including Fife Council have developed online self-service housing advice tools which can be accessed by applicants 24 hours a day, 7 days a week.

Risks

- Customers are not aware of the range of homelessness advice and assistance available;

- Information is not readily available to vulnerable and hard to reach groups;

- Information is not available in a timely manner to prevent homelessness occurring; and

- Service demands are impacted through provision of advice in relation to ongoing non-emergency enquiries.

3.1 Recommendations: Communication and provision of information

The Council should introduce a range of communication methods to ensure customers are aware of the information and support services available. This should include:

1. Consultation with current and previous applicants, and other agencies to understand information requirements and communication preferences for receiving information.

2. The Council's website should be updated to include the following:

   - Information on the range of advice and support available from the Council and what customers can expect including:
     o emergency homelessness assistance;
     o temporary accommodation;
     o housing options advice – including other housing providers;
     o homeless assessments;
     o signposting to other support and advice agencies including financial/debt/legal advice; foodbanks; health services; and drug/substance addiction services; and
     o Inclusion of a frequently asked questions (FAQs) section

   - Legal duties of landlords and creditors such as mortgage providers in relation to issuing a Homelessness Section 11 Notice.

   - Webpages should be subject to regular review to ensure the information remains up to date and in line with policies and legislation.

3. The Council should also develop a leaflet for applicants based on the information set out above. The leaflet should be made available in all Council offices, locality offices, libraries, health centres, Citizen Advice Bureaus, charities and other local support and advice agencies.

4. The Council should consider development of an online self-service housing options advice tool which can be accessed via the Council website and smart phone. The tool would allow applicants to enter details about their circumstances and receive advice on pre-defined outcomes.

The tool would not replace the right for applicants to request information and advice in person, however, would allow applicants to receive person centred advice at a time convenient to them.

Agreed Management Actions

1. A series of engagement events will take place over the remainder of 2019, linked to the development of the Council's Rapid Rehousing Transition Plan. These events will allow the opportunity to engage with all partners including, service users, statutory partners and third sector providers. A focus of these events will include how and what we communicate.

Owner: Alistair Gaw, Executive Director of Communities and Families **Contributors:** Jackie Irvine, Head of Safer and Stronger Communities; Nicky Brown, Homelessness and Housing Support Senior Manager; Debbie Herbertson, Homelessness Services Manager; Brian Stewart, Homelessness Services Manager; Nichola Dadds, Senior Executive Assistant	**Implementation Date:** 31 March 2020

2. Following the engagement events with key stakeholders, the Council's website will be updated to include the information set out within the recommendation, and any other information relevant to key stakeholders.

   Webpages will be subject to regular review to ensure the information remains up to date and in line with policies and legislation.

Owner: Alistair Gaw, Executive Director of Communities and Families **Contributors:** Jackie Irvine, Head of Safer and Stronger Communities; Nicky Brown, Homelessness and Housing Support Senior Manager; Rapid Rehousing Transition Plan Lead Officer (currently recruiting); Debbie Herbertson, Homelessness Services Manager; Brian Stewart, Homelessness Services Manager; Nichola Dadds, Senior Executive Assistant	**Implementation Date:** 30 April 2020

3. Following the engagement events with key stakeholders, we will develop a leaflet for applicants based on the information set out above, and any other relevant information.

   The leaflet will be made available in all Council offices, locality offices, libraries, health centres, Citizen Advice Bureaus, charities and other local support and advice agencies.

Owner: Alistair Gaw, Executive Director of Communities and Families **Contributors:** Jackie Irvine, Head of Safer and Stronger Communities; Nicky Brown, Homelessness and Housing Support Senior Manager; Rapid Rehousing Transition Plan Lead Officer (currently recruiting); Debbie Herbertson, Homelessness Services Manager; Brian Stewart, Homelessness Services Manager; Nichola Dadds, Senior Executive Assistant	**Implementation Date:** 30 April 2020

4. This may be a longer-term option for the service, we are dependent on CGI/Digital Services to progress this option. The current delay in implementing Northgate for our service as well as developing an online EdIndex housing application form has impacted progressing this further.

   It is our aim to develop an online self-service housing options advice tool which can be accessed via the Council website and smart phone.

Owner: Alistair Gaw, Executive Director of Communities and Families **Contributors:** Jackie Irvine, Head of Safer and Stronger Communities; Nicky Brown, Homelessness and Housing Support Senior Manager; Rapid Rehousing Transition Plan Lead Officer (currently recruiting); Debbie Herbertson, Homelessness Services Manager; Brian Stewart, Homelessness Services Manager; Nichola Dadds, Senior Executive Assistant	**Implementation Date:** 31 January 2023

Appendix 1: Basis of our classifications

Finding rating	Assessment rationale
Critical	A finding that could have a: • ***Critical*** impact on the operational performance; or • ***Critical*** monetary or financial statement impact; or • ***Critical*** breach in laws and regulations that could result in material fines or consequences*; or* • ***Critical*** impact on the reputation of the Council which could threaten its future viability.
High	A finding that could have a: • ***Significant*** impact on operational performance; or • ***Significant*** monetary or financial statement impact; or • ***Significant*** breach in laws and regulations resulting in significant fines and consequences*; or* • ***Significant*** impact on the reputation of the Council.
Medium	A finding that could have a: • ***Moderate*** impact on operational performance; or • ***Moderate*** monetary or financial statement impact; or • ***Moderate*** breach in laws and regulations resulting in fines and consequences; or • ***Moderate*** impact on the reputation of the Council.
Low	A finding that could have a: • ***Minor*** impact on operational performance; or • ***Minor*** monetary or financial statement impact; or • ***Minor*** breach in laws and regulations with limited consequences; or • ***Minor*** impact on the reputation of the Council.
Advisory	A finding that does not have a risk impact but has been raised to highlight areas of inefficiencies or good practice.

Please see the Internal Audit Charter for full details of opinion ratings and classifications.

Appendix 2: Areas of audit focus

The areas of audit focus and related control objectives included in the review were:

Advice and Information

- The Council has developed a range of policies and procedures for homelessness and housing support which are aligned to best practice including the Code of Guidance on Homelessness;
- The Council publicises information in a range of ways and places to ensure maximum accessibility; including in person, online, in other languages and formats; and to people with disabilities;
- Information provided includes how Council services (including emergency assistance) can be accessed; details of the Council's duties and case management processes; what is required of the applicant; and what the applicant can expect; and
- The Council provides housing options advice and support including advice on maintaining the applicant's current home (where possible); signposting to other support and advice agencies (including mediation); and details of other housing providers in Edinburgh.

Homelessness Assessment

- All applicants seeking homelessness advice and assistance are offered an appointment for an interview;
- If the applicant has nowhere to stay that night, the interview is carried out the same day, or interim accommodation provided until the interview is arranged;
- All interviews are conducted in private meeting rooms, with the individual's requirements considered, including provision of same sex officers; interpretation or translation services; and arrangements for hard of hearing or visually impaired applicants;
- The Council undertakes eligibility checks to establish if the applicant is eligible for homelessness assistance prior to offering accommodation and/or an assessment;
- The Council's processes ensure that all homelessness assessments consider the three tests of homelessness in line with relevant legislation and the Code of Guidance on homelessness;
- Interviewing officers advise applicants of their legal duty to disclose accurate information relevant to their assessment, and all applicants sign a proforma to demonstrate their understanding;
- The Council retains a clear record of the circumstances; advice given; and reasons for the final decision, with all appropriate evidence recorded;
- Information recorded during interviews and assessments is limited to that required to make an assessment, with consideration given to the General Data Protection Regulations (GDPR);
- The Council prepares an action plan detailing the options for each individual applicant, and a copy of this is provided to the applicant;
- Applicants are provided with written notification of the Council's decision and right to request a review of the decision within 21 days; and

- Reviews are carried out by a senior officer, with the decision and reasons provided in writing; and

- Complete and accurate records are maintained, including evidence required to support completion of the three stages of the homeless assessment; copy of the outcome and action plan; decision letter (translated if required); signed declarations and any discharge of duty letters.

Housing Support and Advice

- A Care Leavers protocol is in place to ensure the Council meets its corporate parenting responsibilities and assist young people who are leaving care with accessing appropriate accommodation;

- The Council undertakes assessments to establish if an applicant or household has support needs, with the appropriate EdIndex priority ratings allocated. This includes providing advice and appropriate referrals and contacting other agencies and services;

- The Council provides information, advice, and services for storage of property and kennelling of pets including timescales for disposal and rehoming where necessary.

Temporary Accommodation

- Policies and procedures are in place which set out how the Council will meet its responsibilities to provide temporary accommodation to people who are homeless or threatened with homelessness in Edinburgh;

- The Council fulfils its duty to provide temporary accommodation to applicants who require it, and accurately records where this is not possible; and

- Use of shared house; bed and breakfast; and other unsuitable accommodation for pregnant women and families is limited to 7 days, and where this is breached is accurately recorded and reported to the Scottish Government.

Case Management

- Case management and regular review processes are in place to ensure the Council effectively manages cases until all statutory duties are discharged;

- Applicants are allocated a housing officer for the duration of their case, are provided information on how to contact their housing officer; and how often their housing officer will contact them to review their case, temporary accommodation position, benefits and support needs, and bidding activity;

- Applicants are provided with clear information on their responsibilities during the process, including keeping their contact details up to date, notifying their housing officer of any changes in circumstances, and how to actively bid for properties on a weekly basis as required;

- Silver Priority is awarded at date of award of priority and then by date of application for starters in line with the Council's letting policy;

- Housing Officers adhere to lost contact procedures, with a clear audit trail of efforts to contact, dates and reasons for closure and re-opening of cases evidenced by follow-up notes; and

Housing officers contact applicants prior to any offer of settled accommodation to explain the allocation and sign up process, any support or benefit requirements and to reinforce implications of refusing one offer, and discharge of duty.

Performance monitoring and reporting

- The Council undertakes regular case file audits and quality assurance reviews to ensure it is meeting its statutory duties effectively;

- Processes are in place to ensure the Council accurately gathers and reports data and information on homelessness and housing options as required by the Scottish Government and Scottish Housing Regulator; and

- The Council regularly monitors and reports at both a senior officer and Committee level on a wide range of homelessness processes and performance including compliance with statutory duties, case management, and outcomes.