

CBL Internal Audit Report Briefing Note for Audit and Governance Committee

Purpose

The purpose of this note is to provide details of the Choice Based Lettings Scheme and inform members how the agreed audit recommendations have been /are being dealt with, following the concerns, raised in the report, presented at the Audit and Governance meeting held on 21/09/2015.

Gloucestershire Homeseeker Choice Based Lettings (CBL) Scheme

The Gloucestershire Homeseeker Partnership was formed in 2007 to bring together the six district councils to introduce a Choice Based Lettings scheme, for the allocation of social housing across the county. A countywide policy was agreed and the system introduced in September 2009. The aim of moving to a Choice based lettings scheme was to promote greater customer choice, transparency and fairness.

The web-based scheme enables social housing landlords to advertise their vacant homes, and eligible households can bid for suitable properties for their family size each week.

All applicants seeking social housing across Gloucestershire complete the same application process via the internet at www.gloshomeseeker.co.uk and are assessed against the criteria laid out in the Gloucestershire Homeseeker Policy. Once an application has been made, applicants are advised of their housing need banding, application date and unique reference number. This enables households to bid for social housing vacancies advertised through the choice based letting system, each week. Bidding for properties is via the internet, the automated phone line or by text message.

All applicants have the right to request a review of their housing need assessment and the Homeseeker Appeal Process can be found on the website.

Progress of how the agreed audit recommendations have been /are being dealt with.

Concern	Progress
<ul style="list-style-type: none">CBL system access should be immediately disabled for the 8 leaver cases identified within the audit review.	Completed on 14 th August 2015.
<ul style="list-style-type: none">The Housing Services Manager (HSM) should ensure that strengthening of the CBL system user access controls is required by the Management Board and Operations Group when update of the CBL	This is a function that is available in the updated version of the current CBL system and is something that will be requested as a necessity when either upgraded or another system is purchased.

<p>system is completed.</p>	
<ul style="list-style-type: none"> • Until a new CBL system is procured, the HSM should complete a regular review (e.g. monthly) of Gloucester system user accounts to ensure that users are appropriate current officers. 	<p>Monthly monitoring review now in place for all Gloucester City Council users.</p>
<ul style="list-style-type: none"> • The HSM should consider improvement of controls over new user set up – including a new user set up form requiring authorisation, to ensure that only relevant authorised officers are given appropriate access within the CBL system and have signed up to relevant Data Protection/Information Security requirements. 	<p>Gloucestershire Homeseeker Operations group, looked at the roles available to staff on the system to address some of the access issues, and instructed that a super-user role was created. This means that only the super users can add/amend user access roles on the system. Reporting was also added to this role as one authority did not want all staff able to access/run reports. The ability to add/amend users was removed from every other role available on the system so that this can be managed closely. Since this change has been implemented it has become apparent that it this is not the perfect solution.e.g. some feel that there are still too many super users and that maybe reporting should not have been included; and a working group has been set up to look at this issue, among others raised.</p> <p>Every year an audit is carried out on all users by the GHS Co-ordinator to ensure that the users on the system still need access. Anyone identified during this audit that has not used the system for 3 months will have their account suspended. However local authority partners have a responsibility to ensure their team's access is up to date and only users who require access, have access.</p> <p>The GHS system is an online hosted solution which by definition means people can access the system from any PC/Laptop with internet connection. There are around 220 users that have access to GHS (August 2015 user audit) so what is in place to ensure users are responsible? All Councils are signed up to data protection policy within their staff induction and RP's are expected to sign up to Service Level Agreements/Data</p>

	Sharing Protocol to reinforce the importance of protecting data and to outline our data protection expectations as a Choice Based Lettings System.
<ul style="list-style-type: none"> The HSM should raise at an appropriate Partnership level that new user set up and leaver de-registration controls should be considered for implementation Partnership wide, to reduce the risk of inappropriate release of GCC applicant data. 	<p>The Operational group have been discussing what needs to be put in place to reduce this risk:</p> <ul style="list-style-type: none"> A new, brief data protection/data sharing agreement has been written that must be signed by all new users (Registered Providers) before they can have access to the system. All Registered Providers have been asked to sign a new agreement to highlight their responsibility to inform the GHS co-ordinator should a GHS user leave their company and no longer requires access to GHS
<ul style="list-style-type: none"> CBL assessing officers should be reminded that assessment and banding letters should be formally issued, following completion of assessment & banding. 	Discussions have taken place with the Choice Based Lettings Team to enforce the importance of notifications being issued following any changes to housing need assessments and banding outcomes.
<ul style="list-style-type: none"> Training of Homelessness team officers should be completed to ensure that the Gloucestershire Home-seeker Policy criteria for application suspension, annual renewal and cancellation is understood and appropriately applied. 	CBL training is now included in the induction programme for all new homeless officers, who have to demonstrate proficiency at the end of the probationary period. The Homeless Team Leader is currently shadowing homeless officers to identify training needs and to ensure processes are followed correctly, to deliver the same standard of service to all customers.
<ul style="list-style-type: none"> The HSM should ensure that all stage 1 decision review requests are processed in line with the Gloucestershire Home-seeker Policy and Appeals Process guidance. Where the H&HASM is aware that additional review time will be required (due to workload/backlog), the 	Review of the Appeals Process has been completed by the Housing Services Manager and the audit recommendations included in the revised process. The backlog of appeals due to staff resources and high number received at the beginning of the financial year has now been addressed.

<p>applicant should be contacted within the initial 14 days review criteria to be informed of the Council position and expected timing for decision.</p>	
<ul style="list-style-type: none"> • CBL targets for housed applicants should be reviewed in line with the agreed criteria (and updated where required) to ensure that the target percentages are reasonable, based on current housing supply and demand within Gloucester, and able to support the goal of balanced communities. The review should be evidenced by appropriate, authorised audit trail. 	<p>The Housing Services Member Information Sheet is produced at the end of each month and at the end of each financial year. The number of households seeking social housing by housing band and bedrooms required, and the number of social homes let by band and bedroom size is included. At the end of the previous financial year there was a total of 556 lettings, of which 5%Emergency Band, 50% Gold Band, 38%Silver Band and 7% Bronze Band.</p> <p>The current financial year, at the half year point,5% Emergency Band,59% Gold Band,33% Silver Band & 3% Bronze Band.</p>
<ul style="list-style-type: none"> • The HSM should ensure that data and document retention and destruction are considered by the Management Board and Operations Group when update of the CBL system is completed i.e. ensure that the system supports destruction of an applicant's core information and supporting documentation, where applicable and permitted, while maintaining key performance audit trail within the system. 	<p>This is a function that is available in the updated version of the CBL system and will be requested as a necessity when current system upgraded or another system is purchased.</p>
<ul style="list-style-type: none"> • At a service level, the Council's CBL data retention and destruction policy should be reviewed and updated to ensure that it is in line with regulatory and operational requirements. 	<p>Each Local Authority is responsible for this. It will be added to the next Management Board Agenda to ensure all Data Retention Policies are in line with regulatory and operational requirements prior to the upgrade/purchase of a new system.</p> <p>Gloucester's retention policy is in need of a review to comply with the Data Protection Act and is being looked at by the Information Security Board.</p>

Outcome

The Gloucestershire Homeseeker Management Board has appointed a Project Manager to procure an improved software package to address the concerns raised in the audit report.

All administrative processes where issues were identified, within the Housing Services team have now been addressed.

Mary Hopper**Housing Services Manager****4th November'15**