

Hinckley and Bosworth Borough Council Internal Audit Final Report Homelessness (2024/25)

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Reporting Timetable

Debrief Meeting: 13/05/2025

Draft Report Issued: 30/05/2025

Comments Received:

01/08/2025

Final Report Issued: 14/08/2025



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This report ("Report") was prepared by Forvis Mazars LLP at the request of Hinckley & Bosworth Borough Council and terms for the preparation and scope of the Report have been agreed with them. The matters raised in this Report are only those which came to our attention during our internal audit work. Whilst every care has been taken to ensure that the information provided in this Report is as accurate as possible, Internal Audit have only been able to base findings on the information and documentation provided and consequently no complete guarantee can be given that this Report is necessarily a comprehensive statement of all the weaknesses that exist, or of all the improvements that may be required.

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Your One Page Summary

Audit Objective: To ascertain the adequacy and effectiveness of the key controls in place in relation to Homelessness.

Audit rationale

Why the Audit is in Your 2024/25 Plan

To review the arrangements in place to reduce the level of homelessness and use of temporary accommodation

Your Strategic Risk

Increased homelessness presentations and temporary accommodation requirements.

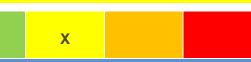
Your Strategic / Tactical Objective

Help people to stay healthy, happy and active and continue to provide initiatives that support children and young people, older people and our vulnerable residents

Summary of our opinion

Moderate Opinion

See Appendix A1 for definitions



Summary of Recommendations

High Priority	-
Medium Priority	1
Low Priority	4

Actions agreed by you	100%
High Priority completion	N/A
Overall completion	January 2026

Summary of findings

Examples of good practice

- Homelessness and Rough Sleeping Strategy in place that was readily available for staff members on the intranet.
- ✓ A range of ways in which customers can approach the Council for support e.g. via email, customer services, Council's website, and visiting the Council Hub.
- ✓ The Housing Options team follows set criteria when establishing who is eligible for temporary accommodation.

Medium Priority Findings

Long time periods in between communications and Personalised Housing Plan (PHP) reviews not recorded.

Key root causes

 Delays caused by third parties and cases not reallocated in a timely manner due to team workloads.

01 Summary Action Plan

Below is a high-level summary of the actions that are intended to support your management of this risk area. Further detail about our findings, which have been discussed with management, are provided in our detailed action plan (see 03 Detailed Action Plan).

Ref	Recommendation	Priority	Responsible Person	Due Date
1	 The Council should arrange with customers when the PHP reviews will be taking place to prevent communications being postponed. The Housing Options team should record the PHP reviews in the meetings section of the case management system, and any important changes arising from these must be recorded on the system. 	Medium	Joanne Wykes Housing Options Manager	30 November 2025
2	The Housing Options Team should implement a clear internal service standard for completing Housing Assessments (e.g. within 10 working days of initial triage) and assess performance against this.	Ioanne Wykes Housing		31 October 2025
3	The Council should implement six monthly meetings that evaluate the progress against the priorities in the Action Plan and ensure key actions arising from the meetings are documented.	Low	Madeline Shellard Head of Housing	31 October 2025
4	 The Housing Options team should update the Temporary Accommodation Procedures to: Outline to staff that the cheapest third-party provider that meets the needs of the customer should be used. Include a hierarchy of preferred providers based on cost, quality, location and customers' needs. 	Low	Joanne Wykes Housing Options Manager	31 October 2025

Introduce a regular reporting cycle to SLT and establish the information that will be reported on. This may include: Key movement in KPIs The number of individuals in Temporary Accommodation Costs of the Temporary Accommodation	Low	Madeline Shellard Head of Housing	31 January 2026
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02 Value for Money and Sector Comparison

Within each of our reports, we summarise any observations we have made about the effectiveness, efficiency and economy of your operations. This is to support our portfolio of public and social sector organisations with value for money considerations. We also summarise how you compare to similar organisations, which is intended to bring you the benefit of our insight.

Value for Money



One way of achieving efficiency in managing homelessness cases is by using a case management system as it can provide improved workflow management and a single record for all cases, making them easily accessible. Hinckley uses a homelessness management software called MRI Agora Gateway which allows tracking

of all cases, as well as highlighting urgent actions on the dashboard front page to allow these to be prioritised.

Accuracy of data and early intervention are essential facets of correctly managing cases of homelessness to prevent the requirement for temporary accommodation. The Council Triage Officers conduct a Homelessness Needs Initial Assessment (triage) on potential applicant cases, which evaluates what level of help will be required. In analysing a sample of homelessness intervention cases over the period April 2024 to April 2025, we found that for all ten samples, a triage had been completed for the Council to assess the level of intervention that would be required. This demonstrates value for money practice as the level of intervention required is assessed early in the process allowing the Council to use resources on those that need it the most.

Sector Comparison

The NAO's Report¹ (June 2024) on the effectiveness of government in tackling homelessness noted the challenges facing the government and local authorities to tackle homelessness, demonstrating the importance of a robust control framework.



Day-to-day work by case officers is most effective when it works in harmony with a robust framework, in the form of a Homelessness Strategy. We typically expect to see a medium to long term strategy which guides the management of homelessness intervention. The Council has a Homeless and Rough Sleeping Strategy for 2022-2025, which they have planned to update towards the end of the year.

A core tenet of homelessness reduction and support in any Council is effective case management. Councils are facing financial constraints to administrate this area, and decreasing resource hours to manage complex requirements can lead to a slide in quality of administration, which has knock-on effects on quality of work. While Councils cannot unilaterally increase budgets or reduce the number of individuals becoming homeless, a key mitigation strategy is effective data and case management. Improvements in these areas can alleviate some of the pressure and improve quality of service. Throughout our audit we established that cases in our sample were managed in line with the Homelessness Procedures with supporting documentations for decisions held on file.

¹ The effectiveness of government in tackling homelessness - NAO report

03 Detailed Action Plan

We have identified areas where there is scope to improve the control environment. Our detailed findings are provided below. Definitions for the levels of assurance and recommendations used within our reports are included in Appendix A1.

1. Long time periods in between communications and Personalised Housing Plan (PHP) reviews not recorded.

Finding(s) and Risk

Communication between the Council and customers should be consistent to ensure that changes in circumstances are reviewed and actioned by the Council in a timely manner.

We found that there was no automatic way for the Council to identify if there have been any changes in customers' circumstances. The Housing Options Manager explained that changes in circumstances would be identified via the Housing Officers regularly communicating with customers through the personalised housing plan (PHP) reviews which should take place biweekly. The PHP review calls between the Council and customers allow the Council to recognise where circumstances have changed and establish the duty of care to the customer. However,

We reviewed a sample of five cases out of 118, from April 2024 to April 2025 from the Bed and Breakfast (BB) sheet , which is maintained by the Housing Options Team Leader, where the Council has a duty to provide temporary accommodation and identified:

- In one case (1098661), there was a communication gap between the Housing Officer and Customer of three weeks and then six weeks. Communication had been postponed due to difficulties in arranging a time to meet with the customer for the PHP review meeting. The Housing Options Manager informed us that this was due to fluctuating officer workloads, and higher risk cases being given priority.
- In one case (1003813), while there were regular communications between the Housing Officer and Customer to discuss PHP actions, the PHP review meetings were not recorded for the duration of the accommodation provision.

Recommendation(s)

- The Council should arrange with customers when the PHP reviews will be taking place to prevent communications being postponed.
- The Housing Options team should record the PHP reviews in the meetings section of the case management system, and any important changes arising from these must be recorded on the system.

Root Cause(s)

The Housing Options team use personal outlook calendars to arrange PHP meetings with customers, and dates are not recorded on the case management system.

Cases that are higher risk are prioritised, so communications are temporarily postponed.

The Housing Options Manager stated that the PHP reviews occur, but they were not marked as complete on the meetings section of the system. This case had closed at the time of the audit fieldwork.

Risk and Impact: Where the Council is not maintaining regular and timely communication with customers, there is a risk that individual needs and changes in circumstances are not identified promptly, leader to delays in support of provision of temporary accommodation.

Where the Council is not consistently recording PHP reviews in the system, there is a risk that they cannot evidence compliance with statutory duties, which could lead to legal challenges and reputational damage.

Management Comments / Agreed Actions

Directives to the team regarding case recording and PHP to customers to be implemented.

Responsible Person	Joanne Wykes Housing Options Manager	Action Due Date	30 November 2025
		Priority Level	Medium

2. Delays in completing the Housing Assessment after the initial triage.

Finding(s) and Risk

The HRA 2017 National Practitioner Support Service Flow Chart stated that the first stage of processing a Homelessness Application is the initial triage, which is completed by the Triage Officers, and the second stage is the Housing Assessment, completed by the Housing Officers. Upon initial triage, the Housing Officers will distinguish the level of support from the Council required at the point in time. The Housing Assessment identifies the duty, and level of intervention required.

The Homelessness Reduction Act (HRA) 2017 outlines the following three duties:

- Prevention Duty (Section 195): this duty applies to anyone at risk of homelessness in the next 56 days.
- Relief Duty (Section 188): this applies once a person is already homeless.
- Main Duty (Section 193): this is the duty to secure settled accommodation for applicants who are unintentionally homeless

From our sample of ten cases² from the BB Sheet (April 2024 to April 2025) ' in one case (1035632) (in Relief Duty ³ at the time of the audit), we found that the Housing Assessment was completed 22 days after the initial triage. We were informed, by the Housing Options Manager that the delay was due to the Housing Officer waiting nine days for confirmation of homelessness from a third party. Additionally, the assigned Housing Officer had a bereavement, therefore the case was reassigned to a new member of staff who works part time. We were advised that there is not an internal service standard for completing Homelessness Assessments

Risk and Impact: Where the Housing Assessment is not completed in a timely manner after the initial triage, there is a risk that there are delays in the Council

Recommendation(s)

The Housing Options Team should implement a clear internal service standard for completing Housing Assessments (e.g. within 10 working days of initial triage) and assess performance against this.

Root Cause(s)

The Housing Officers were waiting for confirmation of homelessness from a third party and once received the allocated Housing Officer had a bereavement, therefore the case was reallocated.

² A separate sample of cases where the Council has established a Relief Duty.

³ Section 189 the 'relief duty' – requires housing authorities to help people who are homeless to secure accommodation.

establishing if they have a duty to the individual leading to increased homelessness across the borough.

Management Comments / Agreed Actions

Procedures to reflect timeframes around expectations to be circulated to all officers. Performance against this target to be introduced once staffing pressures have been addressed.

Responsible Person	Joanne Wykes Housing Options Manager	Action Due Date	31 October 2025
		Priority Level	Low

3. No set review cycle to track progress against the Homelessness Strategy Action Plan.

Finding(s) and Risk

To ensure that the Council takes proactive action to prevent homelessness in the Borough, it is best practice for the Homelessness Strategy Action Plan, to align to the Homelessness and Rough Sleeping Strategy. The Action Plan should include clear goals, clear tasks, assigned responsibilities, realistic timelines, and performance measures to evaluate the progress against the actions.

We reviewed the Action Plan included in the Homelessness Strategy, and found that it outlined the priority, action, achievements and gaps/opportunities as well as timescales for the actions

The Team Leader advised that the Manager, Team Leader and Head of Service meet on an ongoing basis to review the Action Plan, however there was not a set cycle for formal review of the Action Plan, and meeting minutes/key actions arising from the meetings were not documented.

Risk and Impact: Where a regular review cycle is not in place for the Action Plan, and where key actions from the meetings are not documented, there is a risk that key strategic objectives may not be met which results in an ineffective or stagnant strategy.

Recommendation(s)

The Council should implement six monthly meetings that evaluate the progress against the priorities in the Action Plan and ensure key actions arising from the meetings are documented.

Root Cause(s)

Actions plans are informally discussed, but updates are not formally documented.

Management Comments / Agreed Actions

Formal meetings against the action plan to be completed every 6 months.

Responsible Person	Madeline Shellard Head of Housing	Action Due Date	31 October 2025
		Priority Level	Low

4. No guidance around prices and costs for the Housing Options team when booking third party accommodation.

Finding(s) and Risk

Staff responsible for placing households in temporary accommodation should follow clear, cost-conscious procedures that prioritise customer welfare and cost to the Council.

The Housing Options Manager informed us that where third-party providers are used, staff must always consider the lowest cost option while simultaneously considering the customers' needs.

The 'Temporary Accommodation Procedures' (January 2025) included guidance on price and on preferred hotels for the team to follow, however, costs for third party temporary accommodation were not outlined. We were advised that this was due to costs of spot purchases varying dependent on the demand in the local area as well as the needs of the customers.

Risk and Impact: Where the Council does not define clear cost thresholds for temporary accommodation there is a risk that inconsistent and high-cost decision will be made, leading to budget inefficiencies and potentially placing clients in unsuitable or inappropriate accommodation.

Recommendation(s)

The Housing Options team should update the Temporary Accommodation Procedures to:

- Outline to staff that the cheapest third-party provider that meets the needs of the customer should be used.
- Include a hierarchy of preferred providers based on cost, quality, location and customers' needs.

Root Cause(s)

There is an understanding in the Housing Options team, however this has not been documented as guidance.

Management Comments / Agreed Actions

To reiterate and formalise arrangements to staff regarding preferred options, subject to availability of TA provision.

Responsible Person	Joanne Wykes Housing Options Manager	Action Due Date	31 October 2025
		Priority Level	Low

5. Irregular reporting to SLT.

Finding(s) and Risk

Reporting on homelessness services to SLT should be regular to ensure that SLT is informed of current situation information, key challenges and progress updates.

Whilst homelessness updates were presented at the February 2024 and November 2024 SLT meetings, we could not confirm that regular reporting to SLT occurs.

Risk and Impact: Where there is not regular reporting to SLT, there is a risk that SLT are not informed of emerging issues leading to delayed decision making.

Recommendation(s)

Introduce a regular reporting cycle to SLT and establish the information that will be reported on.

This may include:

- Key movement in KPIs
- The number of individuals in Temporary Accommodation
 - Costs of the Temporary Accommodation

Root Cause(s)

No set reporting cycle to SLT, with reporting occurring on an Ad Hoc basis.

Management Comments / Agreed Actions

Quarterly performance updates to be provided to SLT.

Responsible Person	Madeline Shellard Head of Housing	Action Due Date	31 January 2026
		Priority Level	Low

A1 Audit Information

Agreed Audit Objective and Scope

The objectives of our audit were to assess whether Hinckley & Bosworth Borough Council has in place adequate and appropriate policies, procedures and controls in relation to Homelessness with a view to providing an opinion on the extent to which risks in this area are managed. The audit considered the following risks relating to the area under review:

Strategic Approach

There is a lack of strategic approach to reducing homelessness.

Proactive Action

 The Council does not proactively take action to prevent homelessness in the Borough.

Guidance

Residents are not aware of how to make a homelessness referral.

<u>Assessments</u>

- Assessments are not performed timely and decision making is not clear, documented and approved.
- Accommodation is allocated to people who are not homeless and are therefore not entitled to accommodation.

Change of circumstance

 Changes in circumstance are not actioned / reviewed, resulting in people who are no longer in need being provided accommodation.

Use of temporary accommodation

- There is an inconsistent application of criteria during the management of the temporary accommodation process.
- The Council does not have the right levels of supply of temporary accommodation to meet the increasing demand.
- Temporary accommodation costs are disproportionately high (for any category of temporary accommodation).
- Individuals may not be placed in temporary accommodation in a timely manner, resulting in an increase in homelessness.

Payments

Inaccurate/ incorrect payments to Non-Council Temporary
 Accommodation Providers or payments made for services not provided.

Management Information

 Management information is inaccurate or untimely resulting in inappropriate decision making.

Scope Limitations

In giving this assessment, it should be noted that assurance cannot be absolute. The most an Internal Audit service can provide is reasonable assurance that there are no major weaknesses in the framework of internal control. Any testing performed was conducted on a sample basis. Our work does not provide any guarantee against material errors, loss or fraud or provide an absolute assurance that material error, loss or fraud does not exist.

Work was delivered by our core Internal Audit team and does not entail specialist review. Testing sought to confirm that the Councils follow their expected control processes and considered alignment to the requirements of the HRA 2017 but does not provide an absolute view over compliance with this.

We were unable to select a sample of ten individuals/families in third party temporary accommodation to ensure that costs are not disproportionately high, as the Council did not monitor the costs per individual/ family, rather they were monitored monthly, the Housing Options Team Leader was able to evidence this on the 'Overall Monthly and Quarterly figures' spreadsheet.

We were unable to confirm that data reported to SLT in the Options Appraisal and Cost of Living report was correct, as the raw data had not been kept by the Council. This was due to the data in the report, such as the number of families in B&B, number of singles in B&B, Total cases in B&B, and Numbers in Hostels being pulled from a live working document at the time of creating the Options Appraisal and Cost of Living report, causing a time lag between the figures in the spreadsheet and the reporting in the report.

Definitions of Assurance Levels and Recommendation Priority Levels

Definitions of Assurance Levels		
Substantial Assurance	The framework of governance, risk management and control is adequate and effective.	
Moderate Assurance	Some improvements are required to enhance the adequacy and effectiveness of the framework of governance, risk management and control.	
Limited Assurance	There are significant weaknesses in the framework of governance, risk management and control such that it could be or could become inadequate and ineffective.	
Unsatisfactory Assurance	There are fundamental weaknesses in the framework of governance, risk management and control such that it is inadequate and ineffective or is likely to fail.	

Definitions of Recommendations			
High (Priority 1)	Significant weakness in governance, risk management and control that if unresolved exposes the organisation to an unacceptable level of residual risk.	Remedial action must be taken urgently and within an agreed timescale.	
Medium (Priority 2)	Recommendations represent significant control weaknesses which expose the organisation to a moderate degree of unnecessary risk.	Remedial action should be taken at the earliest opportunity and within an agreed timescale.	
Low (Priority 3)	Recommendations show areas where we have highlighted opportunities to implement a good or better practice, to improve efficiency or further reduce exposure to risk.	Remedial action should be prioritised and undertaken within an agreed timescale.	

Statement of Responsibility

We take responsibility to Hinckley & Bosworth Borough Council for this report which is prepared on the basis of the limitations set out below.

The responsibility for designing and maintaining a sound system of internal control and the prevention and detection of fraud and other irregularities rests with management, with internal audit providing a service to management to enable them to achieve this objective. Specifically, we assess the adequacy and effectiveness of the system of internal control arrangements implemented by management and perform sample testing on those controls in the period under review with a view to providing an opinion on the extent to which risks in this area are managed.

We plan our work in order to ensure that we have a reasonable expectation of detecting significant control weaknesses. However, our procedures alone should not be relied upon to identify all strengths and weaknesses in internal controls, nor relied upon to identify any circumstances of fraud or irregularity. Even sound systems of internal control can only provide reasonable and not absolute assurance and may not be proof against collusive fraud.

The matters raised in this report are only those which came to our attention during the course of our work and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. Recommendations for improvements should be assessed by you for their full impact before they are implemented. The performance of our work is not and should not be taken as a substitute for management's responsibilities for the application of sound management practices.

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