

Final Internal Audit Report

Care Leavers Accommodation: Quality & Standards

June 2025

Distribution: Corporate Director, CYPE
Director of Children's Social Care
Head of Service – Care in Care & Care Experienced Young People, CYPE
Head of Performance and Business Intelligence, CYPE
Director of Housing – Homelessness Prevention & Accommodation
Head of Temporary Accommodation & Support
Corporate Director of Resources & S151 Officer (final only)
Director of Finance & Deputy S151 Officer (final only)

Assurance Level	Issues Identified	
Limited	Priority 1	2
	Priority 2	5
	Priority 3	0

Confidentiality and Disclosure Clause

This report ("Report") was prepared by Forvis Mazars LLP at the request of London Borough of Croydon 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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Please refer to the Statement of Responsibility in Appendix 3 of this report for further information about responsibilities, limitations and confidentiality.

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1. Introduction

- 1.1 In line with the in the Council's *Local Offer for care experienced young people* (local offer) care experienced young adults (sometimes known as "care leavers") between 18 and 25 are entitled to support from Croydon Council (Council) and their partners. In this regard, the Council provides support, encouragement and help to prepare for adulthood and independent living. The Council aims to support and continue what is working well in the young adult's life, while also assessing and planning actions with them to improve outcomes where this is needed.
- 1.2 The Council's responsibility includes:
- providing a personal advisor and a pathway plan which they are to review,
 - help with financial matters,
 - offering advice and support,
 - keeping in touch,
 - offering to pay for stay during university holidays,
 - providing with a Higher Education Bursary and a Setting up Home Allowance (SUHA), and
 - providing stable accommodation for them.
- 1.3 The social worker and personal advisor works with young people on post 18 housing options, as part of the pathway plan. The Children, Young People and Education (CYPE) team work with the Council's Housing team to assess the young adult's accommodation needs and agree the most suitable type of accommodation and support for them.
- 1.4 Some of the types of accommodation available to Care Experienced Young Adults in Croydon include:
- Staying Put - These are foster carers who continue to have young people live with them after they become young people at 18. Staying put arrangements are funded through an agreement for housing allowances to be paid to the young adult staying put carer;
 - Shared Lives - Where young people have additional needs, shared lives supports care-leavers to live with a family and develop their independent living skills. Shared lives can support people from age 18 onwards;
 - Supported Lodgings - When young adults live with a single person, a couple, and/or with other young people or children;
 - Supported Accommodation - This may be a flat, shared house or a private house with additional support provided to help manage day to day arrangements;

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- Social Housing - Living independently, this may be a house, flat or studio or house share. The young adult will be responsible for their own tenancy; and
 - House Project - The house project works with young people on cooperative principles, through which young people leaving care work together to refurbish properties that become their home and build a long-term community of support.
- 1.5 Some young, care experienced adults may also be placed into temporary accommodation (TA), following referrals from the CYPE Team.
- 1.6 At the time of audit, the Housing Team managed the process for care experienced young people placed in temporary accommodation, while the CYPE Team managed the process for all other accommodation types.
- 1.7 The Council has established a Housing Panel where the needs of Care Experienced Young Adults are to be discussed to support in ensuring that a suitable accommodation is provided.
- 1.8 This audit focused on the quality and standards of the accommodation provided to Care Experienced Young Adults (Age 18-25 years).
- 1.9 The terms of reference was shared with the Director of Housing - Homeless Prevention and Accommodation (Housing Team) and the Director of Children's Social Care (CYPE) on 17th July 2024 and an initial request for information list was sent on the 23rd of July 2024. Following discussions, a revised ToR was issued on the 25th of July.
- 1.10 The audit was undertaken as part of the agreed Internal Audit Plan for 2024/25. The objectives, approach and scope are contained in the Audit Terms of Reference at Appendix 1.

2. Key Issues

Priority 1 Issues

The Council did not have a process to help ensure that the accommodation being offered to a Care Experienced Young Adult met their specific needs.

For a sample of seven Care Experienced Young Adults placed in TA in the financial year 2023/24, there were no minutes available from the Care Experienced Young Adults Housing Panel, and referral forms were either not provided or unsigned in all but one case. **(Issue 3)**

The Council did not have a policy in place to govern the need for a pre-inspection of accommodation before Care Experienced Young Adults were placed.

Additionally, testing of the documentation retained for a sample of seven Care Experienced Young Adults placed in temporary accommodation found that in all seven cases the Council was missing at least one required health & safety certificate (out of Fire, Gas, Electrical and Water). **(Issue 4)**

Priority 2 Issues

Internal Audit did not receive any evidence of a policy or procedure providing guidance over the management of Care Experienced Young Adults' accommodation in the Housing directorate. General guidance documents published by the Department of Communities and Local Government were provided, rather than council-specific procedures. **(Issue 1)**

Internal Audit did not receive any evidence of a policy or procedure providing guidance over the management of Care Experienced Young Adults' accommodation in the CYPE directorate. **(Issue 2)**

The Council does not have a process to ensure that health & safety inspections have been carried out for third-party accommodation providers. **(Issue 5)**

The Housing directorate did not have any defined key performance indicators (KPIs) in relation to Care Experienced Young Adults' accommodation and there was no formal reporting of progress/performance in this area beyond the reporting of mandatory health & safety certifications. **(Issue 6)**

The CYPE directorate did not have any defined key performance indicators (KPIs) in relation to Care Experienced Young Adults' accommodation and there was no formal reporting of progress/performance in this area beyond the reporting of mandatory health & safety certifications. **(Issue 7)**

There were no Priority 3 issues.

3. Actions and Key Findings/Rationale

Control Area 1: Legislative, Organisation and Management Requirements

Priority	Action Proposed by Management	Detailed Finding/Rationale – Issue 1
2	<p>Practice Guidance regarding the role of the Young People's 16+ Service in assessing the quality of accommodation offered to care experienced young people has been issued, see attached document.</p> <p>A jointly owned procedure by Housing and Children's Social Care Directorates is in development to be completed by 30th September 2025.</p>	<p>Expected Control</p> <p>The Council has clear policies in place that set out expectations in relation to Care Experienced Young Adults accommodation, in line with current legislation. Additionally, the Council has up to date procedure documents, which set out internal processes, including clear roles and responsibilities for teams and individuals involved in the process.</p> <p>Finding/Issue</p> <p>Evidence of a policy or procedure for the management of Care Experienced Young Adult accommodation was not provided.</p> <p>The Director of Housing Homelessness Prevention and Accommodation advised that, while policies and procedures for identifying accommodation were in place, these were not specific to Care Experienced Young Adults. The Temporary Accommodation team did provide copies of <i>A Decent Home: Definition and Guidance for Implementation (2006)</i> and Chapter 17 (Suitability of accommodation') of the <i>Homelessness Code of Guidance for Local Authorities (published 2018, updated 2024)</i>. However, these are guidance documents published by the Department of Communities and Local Government, rather than council-specific procedures.</p> <p>Risk</p> <p>Where the Council's framework for managing Care Experienced Young Adults' accommodation has not been defined in a policy, and written processes and</p>
Responsible Officer	Deadline	
Head of Service Children in Care & Care Experienced Young People / Strategic Lead Housing Needs, Private Sector Housing and Partnerships	30 th September 2025	

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		<p>procedures are not in place, there is a risk of inconsistent practices, this could lead to poor performance and unsatisfactory conditions for Care Experienced Young Adults.</p> <p>Where the Council does not monitor and review the quality of third-party provided accommodation, even where the Council is not directly responsible for quality, there is a risk that Care Experienced Young Adults will be placed in inappropriate accommodation, which could result in damage to their physical or mental wellbeing.</p>
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Control Area 1: Legislative, Organisation and Management Requirements

Priority	Action Proposed by Management	Detailed Finding/Rationale – Issue 2
2	<p>Practice Guidance regarding the role of the Young People's 16+ Service in assessing the quality of accommodation offered to care experienced young people has been issued, see attached document.</p> <p>A jointly owned procedure by Housing and Children's Social Care Directorates is in development to be completed by 30th September 2025.</p>	<p>Expected Control</p> <p>The Council has clear policies in place that set out expectations in relation to Care Experienced Young Adults accommodation, in line with current legislation. Additionally, the Council has up to date procedure documents, which set out internal processes, including clear roles and responsibilities for teams and individuals involved in the process.</p> <p>Finding/Issue</p> <p>Evidence of a policy or procedure for the management of Care Experienced Young Adult accommodation was not provided.</p> <p>The Director of Children's Social Care advised that the Council does not have an internal framework or standards governing the quality of accommodation provided for the other accommodation types. The Director explained that the responsibility for ensuring quality and standards did not sit with the Council, as this was the accommodation provider's responsibility. However, the Head of Service – Children Looked After & Care Experienced Young People advised that policies and procedures relevant to temporary accommodation would also apply to the other accommodation types.</p> <p>Risk</p> <p>Where the Council's framework for managing Care Experienced Young Adults' accommodation has not been defined in a policy, and written processes and procedures are not in place, there is a risk of inconsistent practices, this could lead to poor performance and unsatisfactory conditions for Care Experienced Young Adults.</p> <p>Where the Council does not monitor and review the quality of third-party provided accommodation, even where the Council is not directly responsible for quality, there is</p>
Responsible Officer	Deadline	
Head of Service Children in Care & Care Experienced Young People / Subject Matter Expert - CYPE	30 th September 2025	

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		a risk that Care Experienced Young Adults will be placed in inappropriate accommodation, which could result in damage to their physical or mental wellbeing.
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Control Area 2: Suitability Assessments

Priority	Action Proposed by Management	Detailed Finding/Rationale - Issue 3
1	<p>As explained during the audit substantial improvement work was required across the Housing Directorate including the provision for Care Experienced Young People, in partnership with the Children, Young People & Education Directorate.</p> <p>The Council has approved a Joint Housing Protocol, the new Housing Panel had been designed and commenced at the time of the audit.</p> <p>A jointly owned procedure by Housing and Children's Social Care Directorates is in development to be completed by 31st July 2025.</p>	<p>Expected Control</p> <p>Statutory requirements around Temporary Accommodation are laid out in the with Homelessness Code of Guidance for Local Authorities (published 2018, updated 2024), which includes specific provisions for Care Experienced Young Adults.</p> <p>Local Authorities must assess whether accommodation is suitable for each applicant on an individual basis and case records should demonstrate that statutory requirements have been taken into account when allocating accommodation. Each case is considered by a housing panel to ensure that the property is suitable for any specific needs that the Care Experienced Young Adult may have, and case records (including referral forms) demonstrate that these have been considered.</p> <p>Finding/Issue</p> <p>The Temporary Accommodation team explained that, at the time of the audit (August 2024), there was no documented process for assessing the suitability of accommodation for Care Experienced Young Adults, or for where the accommodation assigned was found to be unsuitable.</p> <p>The Director of Housing, Homeless Prevention and Accommodation further explained that historically referrals had been provided by a Social Worker and had included any specific needs of the Care Experienced Young Adults. It was not clear why this process was no longer followed.</p> <p>Moving forward, it was intended that referrals would be discussed at the Care Experienced Young Adults Housing Panel, where there would be an opportunity to assess suitability needs. Furthermore, the Care Experienced Young Adult would be provided with an opportunity to view the property in advance to confirm suitability.</p>
Responsible Officer		Deadline
Head of Service Children in Care & Care Experienced Young People / Strategic Lead Housing Needs, Private Sector		30 th September 2025

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<p>Housing and Partnerships</p>		<p>Testing of the records retained for a sample of seven Care Experienced Young Adult Care Experienced Young Adults placed in temporary accommodation (TA) between 1 April 2023 and 31 March 2024 found that:</p> <ul style="list-style-type: none"> • In all seven cases, Panel minutes were not provided. The Director of Housing - Homeless Prevention and Accommodation advised that panel minute evidence for historic cases was unlikely to be available, as this process was only implemented in financial year 2024/25, after the date range for the testing sample; • For three cases referral forms were not provided. The Temporary Accommodation Officer advised that because these were urgent placements a referral was not provided, and these were not discussed at Panel. Email trails were provided to substantiate that these were urgent cases; • Three of the referral forms (for the four cases where referral forms were provided) had not been signed by the authorising officer; and • For four cases, it could not be confirmed whether a final viewing of the property had taken place with the Care Experienced Young Adults (whereas in other cases this was expressly mentioned in the case files). <p>Documentation for a sample of 13 Care Experienced Young Adults placed in other types of accommodation (besides Temporary Accommodation) during the financial year 2023/24 although requested was not provided.</p> <p>No testing of instances where the accommodation was considered unsuitable was conducted due to delays in documentation being provided.</p> <p>Risk</p> <p>Where the Council does not undertake checks to ensure that the accommodation meets the needs of Care Experienced Young Adults, there is a risk that the young adults will be placed in inappropriate accommodation which could impact their physical and mental wellbeing. This would further put the Council in breach of its duty of care.</p>
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Control Area 3: Pre and regular inspections

Priority	Action Proposed by Management	Detailed Finding/Rationale – Issue 4
1	There is no policy or procedure in place defining requirements to pre and regular inspections. However, all properties being used for Care Experienced Young Adults are pre inspected. All compliance documents for new properties are now automatically uploaded to NEC and regular reports are run to identify any missing documents and/or certificates that are due to expire. Information is provided to the Young Person/PA and S/W, upon placement, on how to report a repair and follow up inspections will be carried out on a risk-based approach dependent on complaints/repair requests. The Procurement team are working through transferring compliance data from SharePoint to NEC.	<p>Expected Control</p> <p>The Council has a defined schedule of pre-inspections and regular inspections of properties being used for Care Experienced Young Adult accommodation. This process specifies responsibility for conducting inspections, the required frequency of inspections, the records to be retained of completed inspections, and the processes for where remedial works or concerns are identified.</p> <p>Finding/Issue</p> <p>The Director of Housing, Homelessness Prevention and Accommodation explained that that there was no policy or procedure in place defining the Council's requirements around pre and regular inspections of properties being used for Care Experienced Young Adult accommodation.</p> <p>The Contracts Management Team Leader did; however, advise that a manual compliance tracker had been developed to collate and track the completion of health and safety inspections. Review of this tacker noted that the document was incomplete, and the Team Leader stated that it was still in development at the time of the audit fieldwork.</p> <p>During a walkthrough, Housing management advised that compliance documents for temporary accommodation were still being held on SharePoint at the time of audit, although it was intended to migrate these to the NEC system in the near future.</p> <p>Testing of documentation for a sample of seven cases in which Care Experienced Young Adults (aged 18-25) were placed in temporary accommodation (TA) between 1 April 2023 and 31 March 2024 found the following:</p> <ul style="list-style-type: none"> • In all cases certificates of water testing were not provided;
Responsible Officer	Deadline	
Head of Temporary Accommodation & Support Services /Strategic Lead Housing Needs,	September 2025	

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<p>Private Sector Housing and Partnerships</p>		<ul style="list-style-type: none"> • In five cases a fire detection and alarm system inspection and servicing report were not provided; • In four cases a 'Gas Safety Record' (GSR) was not provided. In one case, where a GSR was provided, the next inspection was overdue at the time of the audit (due on or before 14 June 2024); and • In three cases an electrical Installation condition report (EICR) was not provided. In two of these cases an electrical installation certificate was provided, however one of these was dated 2017, placing it past the five-year validity period at the time of audit. <p>Internal audit did not follow up on remedial work or actions identified due to delays in conducting fieldwork.</p> <p>Risk</p> <p>Where inspections are not carried out prior to and after placing a Care Experienced Young Adult in accommodation, to ensure suitability of accommodation, there is a risk that the Council fails to identify or correct potentially dangerous accommodation. This could mean that Care Experienced Young Adults are living in substandard properties, where they may suffer harm. This could further result in legal and reputational implications.</p>
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Control Area 3: Pre and regular inspections

Priority	Action Proposed by Management	Detailed Finding/Rationale – Issue 5
2	A procedure will be devised and implemented by 30 th September 2025.	<p>Expected Control</p> <p>The Council ensures that accommodation being used by Care Experienced Young Adults is subject to pre-inspections, and that regular inspections of properties required by health & safety regulations are being conducted. Where accommodation is provided by third parties, the Council has sufficient oversight to ensure that safety requirements are being met.</p> <p>Finding/Issue</p> <p>For accommodation other than Temporary Accommodation, the Director, Children's Social Care stated that providers were responsible for completing inspections and ensuring the property was fit for use, and that this responsibility did not sit with the Council.</p> <p>Furthermore, it was advised that the Council did not have a process to maintain oversight over the providers' completion of inspections or ensure that completion of regular inspections is in place. It was explained that this was managed informally as the responsibility was with the contractors.</p> <p>Risk</p> <p>Where inspections are not carried out prior to and after placing a Care Experienced Young Adult in accommodation, to ensure suitability of accommodation, there is a risk that the Council fails to identify or correct potentially dangerous accommodation. This could mean that Care Experienced Young Adults are living in substandard properties, where they may suffer harm. This could further result in legal and reputational implications.</p>
Responsible Officer	Deadline	
Head of Service Children in Care & Care Experienced Young People / Subject Matter Expert - CYPE	30 th September 2025	

Control Area 4: Monitoring arrangements

Priority	Action Proposed by Management	Detailed Finding/Rationale – Issue 6
2	<p>Whilst there are KPI's for all forms of temporary accommodation, the transition of holding compliance data onto NEC enables the service to respond swiftly to any gaps.</p> <p>A jointly owned procedure by Housing and Children's Social Care Directorates is in development to be completed by 30th September 2025 which will include specific accommodation KPI's.</p>	<p>Expected Control</p> <p>The Council measures performance against defined key performance indicators (KPIs) and targets, on relevant aspects of the provision of care leavers' accommodation, such as the time to process suitability assessments, number of placements processed, inspections and other issues. These KPIs are regularly shared with senior management.</p> <p>Finding/Issue</p> <p>Housing management advised that the Temporary Accommodation team did not produce any monitoring reports on Care Experienced Young Adults accommodation. Furthermore, the Council did not have any defined KPIs (beyond mandatory health & safety certifications) for this area.</p> <p>The Head of Temporary Accommodation & Support advised that compliance with mandatory health & safety inspections/certifications (such as Gas, Fire, Electrical) was reported monthly to the Compliance Steering Board and also the Homelessness Steering Board for Temporary Accommodation. Internal Audit was provided with the compliance spreadsheet for October 2023 - July 2024. However, it was noted that the data for Legionella & Lift Safety was marked as "TBC." The Contracts Management Team Leader explained that the compliance tracking was a recently implemented process that was still in progress.</p> <p>Furthermore, evidence that compliance statistics, or any other management information was being shared with the relevant groups and boards was not provided. Internal Audit did not receive evidence of any other form of progress/performance reporting other than health & safety compliance.</p> <p>Risk</p>
Responsible Officer		Deadline
Strategic Lead Housing Needs, Private Sector Housing and Partnerships / Head of Temporary Accommodation & Support Services		30 th September 2025

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		Where Key Performance Indicators (KPIs) are not defined or measured and performance against KPIs is not reported to senior management, there is a risk that poor performance goes unnoticed, potentially leaving the Council in breach of its duty of care towards Care Experienced Young Adults.
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Control Area 4: Monitoring arrangements

Priority	Action Proposed by Management	Detailed Finding/Rationale – Issue 7
2	KPI's will be devised as part of the jointly owned procedure to be completed by 30 th September 2025.	<p>Expected Control</p> <p>The Council measures performance against defined key performance indicators (KPIs) and targets, on relevant aspects of the provision of care leavers' accommodation, such as the time to process suitability assessments, number of placements processed, inspections and other issues. These KPIs are regularly shared with senior management.</p> <p>Finding/Issue</p> <p>The Head of Service – Children Looked After & Care Experienced Young People advised that reports are produced internally to check the quality of data, but these do not form part of formal performance reporting. However, evidence of this taking place was not provided.</p> <p>Risk</p> <p>Where Key Performance Indicators (KPIs) are not defined or measured and performance against KPIs is not reported to senior management, there is a risk that poor performance goes unnoticed, potentially leaving the Council in breach of its duty of care towards Care Experienced Young Adults.</p>
Responsible Officer	Deadline	
Head of Service Children in Care & Care Experienced Young People / Subject Matter Expert - CYPE	30 th September 2025	

AUDIT TERMS OF REFERENCE

Care Experienced Young Adult Accommodation: Quality & Standards

1. INTRODUCTION

- 1.1 Care Experienced Young Adults (Care Experienced Young Adults) between 18 and 25 who have been in care, are entitled to support from Croydon Council and their partners. This is set out in called the Local Offer for care experienced young people. The Council provides support, encouragement and help to prepare for adulthood and independent living. The Council promotes what is working well in the young adult's life while assessing and planning actions with them to improve outcomes where needed.
- 1.2 The Council responsibility includes providing a personal advisor, provide with and review a Pathway Plan, help with financial issues, offer advice and support, keep in touch, offer to pay for stay during university holidays, provide with a Higher Education Bursary and a Setting up Home Allowance (SUHA) and provide a stable home for them.
- 1.3 The Social Worker & Personal Advisor works with young people on post 18 housing options, and this is part of the pathway plan. Children, Young People and Education (CYPE) team will work with the Council's Housing team to assess the young adult's accommodation needs and agree the most suitable type of accommodation and support for them.
- 1.4 Some of the types of accommodation available to Care Experienced young adults in Croydon include:
 - Staying Put - These are foster carers who continue to have young people live with them after they become young people at 18. Staying put arrangements are funded through an agreement for housing allowances to be paid to the young adult staying put carer;
 - Shared Lives - Where young people have additional needs shared lives supports carers. Shared lives can support people from age 18 onwards.
 - Supported Lodgings - This is when young adult live with a single person, a couple, and/or with other young people or children.
 - Supported Accommodation - This may be a flat, shared house or a private house with additional support provided to help manage day to day arrangements.
 - Social Housing - Living independently, this may be a house, flat or studio or house share. The young adult will be responsible for their own tenancy.
 - House Project - The house project works with young people on cooperative principles through which young people leaving care work

together to refurbish properties that become their home and build a long terms community of support.

- 1.5 Some young, care experienced adults are placed into Temporary Accommodation (TA), following referrals from Children, Young People and Education (CYPE) TEAM.
- 1.6 This audit will focus on the quality and standards of the accommodation provided to Care Experienced Young Adults (Age 18-25 years).
- 1.7 This audit is part of the agreed Internal Audit Plan for 2024/25.

2. OBJECTIVES AND METHOD

- 2.1 The overall audit objective was to provide an objective independent opinion on the adequacy and effectiveness of controls / processes.
- 2.2 The audit for each control / process being considered:
 - Walkthrough the processes to consider the key controls;
 - Conduct sample testing of the identified key controls, and
 - Report on these accordingly.

3. SCOPE

- 3.1 This audit, focused on Care Experienced Young Adults accommodation: quality & standards, was undertaken as part of the 2024/25 Internal Audit Plan. The specific scope included the following areas and recommendations:

Control Areas/Risks	Issues Raised		
	Priority 1 (High)	Priority 2 (Medium)	Priority 3 (Low)
Legislative, Organisational and Management Requirements (policies and procedures in place)	0	2	0
Suitability Assessments	1	0	0
Pre and Regular Inspections	1	1	0
Monitoring Arrangements	0	2	0
Total	2	5	0

Statement of Responsibility

We take responsibility to London Borough of Croydon 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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