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## INTRODUCTION

1. The National Asylum Support Service (NASS) was established in April 2000 to provide support to eligible destitute asylum seekers in accordance with the requirements of The Immigration and Asylum Act 1999. Before a claim to support has been processed, the asylum seekers will in most instances be provided with emergency accommodation.
2. The emergency accommodation for asylum seekers is arranged by agencies (agencies) through grants provided by NASS. Each month NASS gives the agencies advances based on the estimated accommodation costs for the following month. There are formal agreements with the agencies.
3. There are seven agencies providing emergency accommodation. The four main agencies are as follows, together with the total advances against accommodation costs for the first six months of the current financial year:
 

• The Refugee Council	£24.829 million
• Refugee Action	£5.885 million
• Migrant Helpline	£2.403 million
• The Refugee Arrivals Project	£1.863 million

For all the agencies, the need for emergency accommodation far exceeds the levels anticipated as set out in the original grant agreements, with the consequent increase in the amounts paid to the voluntary sector.

4. This review was undertaken as part of the 2001/02 annual audit plan for the Immigration and Nationality Directorate.

## OBJECTIVES AND SCOPE

5. The objective of the review was to provide an assurance on the adequacy and effectiveness of the controls established for dealing with asylum seekers to the UK including the assignment of, and payments for, emergency accommodation. The scope of this audit has been designed to dovetail into the scope of our other audit involvement in NASS included in the 2001/02 audit plan.
6. Some asylum seekers provided with accommodation only, also receive emergency cash via the agencies for food and other essentials such as basic toiletries. This was not considered within the scope of the audit review.
7. Our work was carried out between August and November 2001. Through an examination of documentation, auditing testing and interviews with appropriate staff members, we reviewed and evaluated the adequacy of the procedures and controls in relation to the provision of emergency accommodation. We also visited two of the agencies, The Refugee Council and Refugee Action.
8. The detailed Objectives and Scope statement is included in the report at Appendix 1.

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## SUMMARY OF FINDINGS

9. The principle findings arising out of the audit give support to the fact that NASS is paying for asylum seekers who are not or are no longer entitled to emergency accommodation. The key areas of concern were:
- The unreliability of the Refugee Council's RIO database of those in emergency accommodation. As this data contributes to the basis of The Refugee Council's claim on NASS, The Refugee Council has been overstating its claims for advance payments. The overall financial impact is being assessed as a matter of urgency by NASS Finance.
  - The failure of The Refugee Council and Refugee Action to insist on the use of the NASS reference number as a common identifier in their database records. The names of many asylum seekers are not standardised, being spelt differently by NASS and the agencies.
  - The failure of the agencies, notably The Refugee Council to process terminations. Over half of those asylum seekers data matched should no longer be in emergency accommodation according to ASYS, having been dispersed or had their support terminated.
  - Additional costs of providing emergency accommodation due the delays in processing the NASS1s (the application for support). The NASS1s should be processed within two working days of the applicant seeking support and any delays can have a significant impact on the ability of NASS to move asylum seekers quickly into dispersed accommodation, which is a more cost effective option.
  - The provision of emergency accommodation, in particular by The Refugee Council, to asylum seekers after they registered a contact address with the Asylum Screening Unit (ASU). Such an address would normally indicate that asylum seekers have accommodation and do not need support. The extent of this problem has not been fully assessed by the NASS Outreach Team.
  - The lack of documented procedures and formal training on ASYS. Current procedures have tended to react to new situations rather than be proactive. Furthermore NASS has not had positive input to the procedures of the agencies; this will be crucial with the introduction of the Induction Centres. This lack of procedures contributed to the lack of communication between NASS Finance and Outreach Teams resulting in the overpayment of the advance to the Refugee Council for November 2001.
10. At the time of the audit, NASS Finance reintroduced visits to the agencies to confirm on the adequacy of their procedures supporting their claims to supplement other checks such as data matching. We were able to join the visits to two agencies and provide guidance on the sort of checks that should be undertaken.

11. The NASS Outreach Team has expanded its programme of property sweeps to cover the whole country. Given the outcome of the visit to properties in Coventry which we joined as part of the audit, the extension of the programme should prove to be beneficial in preventing NASS from paying out for accommodation not required.
12. The NASS Outreach Team has also established a presence at three of the blocked booked accommodation providers in London. Our visit to one of these sites indicated that this was proving to be a successful scheme.

## CONCLUSION AND OPINIONS

13. We recognise that NASS had to be up and running in a short period of time. Since then NASS has been attempting to rationalise its procedures but this process has tended to be reactive rather than proactive. Furthermore the extent to which these procedures have been documented is limited.
14. To ensure that the time that asylum seekers spend in emergency accommodation is kept to a minimum, each of the parties must have a clear understanding of its respective responsibilities and of the interface between them. In order to meet the seven day turnaround, it is critical that deadlines are met. This was not being achieved.
15. In order to provide assurance that NASS is only supporting valid claims, it is important that the records of those in emergency accommodation are in agreement. The results from the first attempt at a comprehensive data match with The Refugee Council's RIO database for London was unsatisfactory.
16. Our opinion is that the system for ensuring that only destitute asylum seekers are provided with emergency accommodation and financial support once they arrive in the UK at the time of the audit was **inadequately controlled**.
17. However we are pleased to note that corrective action has already or is in the process of being implemented in a number of instances.

## DETAILED FINDINGS

### Ownership of the Agency Databases and the Data Held

18. Under appendix A paragraph 10 of the grant agreements, the agencies are required to take such steps as are necessary to ensure the copyright of works created wholly with NASS funds is vested in the Crown. Both the agencies visited during the course of the audit had implemented or were in the process of implementing databases to manage emergency accommodation. NASS had not investigated whether these databases come within the scope of the relevant paragraph.
19. Furthermore the grant agreement does not make specific reference to the arrangements for transferring the service including records of those in emergency accommodation to a new provider should it become necessary.

*Risk:*

*Failure to ensure that the ownership of the database and the data held is protected, could lead to NASS having contractual problems, especially if there is a change of service provider. Any new provider would need the data held in order to ensure the continuance of the service. Furthermore if ownership of the databases were not vested, NASS could lose the opportunity of providing them to other providers with the saving of administration costs.*

#### **Recommended Action No. 1:**

**We recommend that the legal position is investigated regarding the ownership of the voluntary sector databases and the records held under the grant agreement.**

#### **Recommended Action No. 2:**

**We recommend that future agreements/contracts make specific reference to the procedures for the transfer of the service for the provision of emergency accommodation between service providers.**

### Notification of a New Claimant for NASS Support

20. All asylum seekers claiming support are required to submit NASS1s for registration within two working days of being placed into emergency accommodation. This enables NASS to process the claim and the eventual dispersal of the claimants more promptly. We identified that the two working day rule is rarely complied with and that there is no formal mechanism to ensure that the agencies are complying with the terms of their agreements.
21. A few instances were identified as a result of our audit testing where the two day rule appears to have been significantly exceeded. Details of these have been passed to the Outreach Team for further investigation.

*Risk:*

*Any delay in registering the claimant's details on ASYS from the NASS1 could significantly add to the turnaround time, thereby incurring additional costs of keeping the claimants in emergency accommodation which is relatively more expensive than dispersed accommodation.*

**Recommended Action No. 3:**

**We recommend that NASS introduces procedures, in conjunction with the agencies, to ensure that the NASS1s are completed on a timely basis. This could be achieved by requiring the agencies to submit by fax at the end of each day, a list of new arrivals into emergency accommodation. The information required would be the surname, forename and nationality (or as determined). This list could then be monitored by the NASS Registration Unit against the receipt of the completed NASS1s. Any missing forms could be followed up with the agencies.**

**Recommended Action No. 4:**

**We recommend that, where the claimant is a single person, greater use is made of the facility to set up a skeleton record on ASYS from the daily list submitted by the agencies as recommended in recommendation 3 above.**

**Common Reference Numbers**

22. There is no common reference number used to identify asylum seekers. In addition to the reference number(s) given to asylum seekers when they make their asylum claim, each asylum seeker (and dependant) is allocated a sequential number by ASYS when a claim for NASS support is made. The agencies also have their own reference numbers, as do many of the emergency accommodation providers. Due to different spellings of names, comparing records by name only is impractical. For example only 1510 of the records of the 5347 records on RIO as at 12 October 2001 could be matched by forename and surname against ASYS. Also there were only 261 instances where the NASS reference number was quoted on RIO.
23. The Refugee Council does not give a high priority to updating its records with NASS numbers, hence the limited number of instances where the NASS number is quoted. The current Refugee Action spreadsheets do not include the NASS reference numbers.
24. A number of specific instances were identified as a result of our audit testing where we were unable to match the names from the records of the agencies visited and ASYS. Details of these have been passed to the Outreach Team for further investigation.
25. Rather than being assigned with different reference numbers for example, a port reference and a NASS number, it would be more appropriate to issue each asylum seeker and dependants with an unique number used throughout the process. This has been commented on in the recently issued report on NASS

cessations and our paper concerning Operation Crossroads and the London Borough of Tower Hamlets.

*Risk:*

*Failure to adopt a common reference number for use by the agencies and NASS significantly impacts on the effectiveness of any data matching between records of those in emergency accommodation held on ASYS and those of the agencies. As a consequence, it is difficult to be assured that the agencies are only paying, and therefore claiming on NASS, for those asylum seekers who are entitled to emergency accommodation.*

**Recommended Action No. 5:**

**We recommend that all agencies are required to use the ASYS generated reference number in their dealings with NASS. The agencies are sent an acknowledgement with the ASYS generated number confirming receipt of the NASS1.**

**Data Matching of Agency Databases to ASYS Records**

26. Both agencies visited keep a computerised record of those in emergency accommodation and this is used as part of the process of checking the accuracy of the invoices received from the emergency accommodation providers. The Refugee Council has introduced a new database called RIO whilst Refugee Action maintains their records on excel spreadsheets, shortly to be transferred to a database. Up to the time of the audit, there had been no data matching exercise to confirm the accuracy of the agency records against ASYS and vice versa.
27. However, data match exercises were done as part of the audit process but there were significant problems still to be overcome referred to elsewhere in this report. These exercises were to check on numbers who should or should not be in emergency accommodation and were not extended to comparing addresses.

*Risk:*

*There is a risk that if the records of the agencies are overstating the number of asylum seekers in emergency accommodation, they are paying for asylum seekers who are not entitled to emergency accommodation. As a consequence they will probably be overclaiming on their bases of estimates provided to NASS Finance as support to their requests for advances on the grants. There is also the risk that the addresses do not match; the correct address is important for ensuring that asylum seekers receive correspondence for example on dispersal arrangements.*

**Recommended Action No. 6:**

**We recommend that data matching exercises are undertaken monthly and if possible extended to include all the agencies. Discrepancies should be investigated and the agreed numbers of asylum seekers in emergency accommodation should be used as the basis for estimate for the following months advance. The data matching should also be extended to the addresses held on the respective records.**

## The Refugee Council's RIO Database

28. The Refugee Council has recently introduced a database system, RIO, to rationalise its procedures for managing emergency accommodation but the system is not being used to its full capability. Any invoice checks, for example, have to be undertaken on a one to one basis. This is due to the fact that the number of asylum seekers in emergency accommodation recorded on RIO was 5347 as at 12 October 2001, significantly higher than the emergency accommodation register count at approximately 4300. This problem is recognised by The Refugee Council.
29. Furthermore, both these records exceed the number actually in emergency accommodation as recorded on ASYS of approximately 3200, suggesting that The Refugee Council is neither processing the NASS1s promptly nor, more importantly, processing all terminations.
30. A number of specific instances were identified as a result of our audit testing where the provision of emergency accommodation by the agencies should have perhaps been terminated. Details of these have been passed to the Outreach Team for further investigation.

### *Risk:*

*The differences currently call into question the reliability of the RIO database to act tool for managing the provision of emergency accommodation, in particular processing the asylum seekers claims within the contracted period, and terminating the provision of accommodation. Both scenarios have additional cost implications for NASS.*

### **Recommended Action No. 7:**

**We recommend that The Refugee Council is required to align its database records of asylum seekers in emergency accommodation to those records held on ASYS. Any subsequent queries/differences can be investigated and, on resolution, the appropriate database updated.**

## Bases for Estimate for Advance Payments of Grants

31. NASS has requested that the agencies provide documentation to support their bases for estimates so that the validity of the advance requests can be checked by NASS Finance. The Refugee Council submits its estimate based on the current numbers in emergency accommodation and the estimated cost for the next month. For London, this was based on the emergency accommodation providers' register count. The details of payments to The Refugee Council were checked by NASS Finance but not copied to the NASS Outreach Team. Therefore the Outreach Team was not able to challenge the figures. Based on the November 2001, the advance paid to The Refugee Council was in excess of requirements.



*Risk:*

*Failure to ensure the robustness of internal communications may result in inadequate checking of data as in this case where NASS overpaid The Refugee Council. There is also the risk that mixed messages are being given to the agencies if NASS service is not seen to be joined up.*

**Recommended Action No. 8:**

**We recommend that closer co-operation is fostered between the various teams and that all appropriate staff are kept informed of relevant issues, for example the Finance and Outreach Teams over working with The Refugee Council. Desk instructions would help in providing the necessary communication lines.**

**Reconciliation of Actual Spend by Agencies against Advances**

32. The actual spend by the agencies on emergency accommodation taken from their general ledger accounts, was not being monitored/reconciled each month by NASS Finance against the advances made to cover the estimated costs. Currently a full reconciliation is only undertaken at the end of the financial year.

*Risk:*

*Failure to monitor the actual costs against the advances could result in overpayments being made to the agencies during the financial year. Overpayments are currently more likely given the efforts to reduce the numbers in emergency accommodation, in particular spot accommodation, by speeding up dispersals.*

**Recommended Action No. 9:**

**We recommend that NASS Finance monitor the actual costs incurred by the agencies for emergency accommodation against the advances made by fully utilising the request for emergency accommodation advance payment form. This will enable any overpayments to be clawed back by adjusting subsequent advances rather than wait until the year end.**

**NASS Policies and Procedures**

33. In undertaking the audit review, we noted that very few of the NASS emergency accommodation policies procedures, including the use of ASYS, were formally documented. As a result much of the audit was spent trying to establish the procedures from the staff involved. The failure to have procedures documented stemmed from the need to make sure that NASS was up and running by 3 April 2000. The current process appears to be based on catching up as new situations develop rather than being proactive.

*Risk:*

*Without formally documenting its policies and procedures, there is a significant risk that staff are adopting inconsistent practices and in isolation, with the inherent risk that appropriate checks are not being carried out.*

**Recommended Action No. 10:**

**We recommend that, as a matter of urgency, desk instructions are established to ensure that all staff are aware of their duties, to ensure consistency of application of procedures and to ensure continuity when staff changes occur. These should also include a more formal approach to training staff on the use of ASYS.**

**Recommended Action No. 11:**

**In the longer term based on the proposed changes, we recommend that, in the longer term based on the proposed changes, formal documented policies and procedures should be in place prior to the introduction of the new arrangements.**

**Agency Policies and Procedures**

34. It was noted that the extent to which the agencies had formally documented their procedures was variable. Whilst Refugee Action was moving to introducing standardised procedures across its regions, those of The Refugee Council for the use of its new database provided by staff based at HAT, Croydon were minimal. This is likely in part explain the problems The Refugee Council is having problems with the RIO database. Furthermore the NASS input to date into the development of procedures has been limited.

*Risk:*

*Failure of the agencies to demonstrate that they have robust procedures, raises concerns over the ability of their systems to provide effective management of the service provision. Furthermore by not having any positive input from NASS into the development of adequate procedures may have contributed to the development of the different systems by The Refugee Council and Refugee Action at an end cost to NASS ie resources of the agencies could have been used more effectively elsewhere.*

**Recommended Action No. 12:**

**We recommend that any future arrangements with the voluntary sector that their procedures meet the requirements of NASS to:**

- ensure that all asylum seekers receive the same information and service no matter which agency deals with them;
- ensure compliance with the service requirements set out in the agreements;
- provide an interface with NASS's own policies and procedures; and
- avoid the re-invention of the wheel.

## Verification of Addresses by Asylum Screening Unit

35. Although a number of asylum seekers produce evidence of private addresses to the Asylum Screening Unit, there is no mechanism to stop them subsequently claiming to be destitute and requesting emergency accommodation from the agencies. Whilst based on a sample of forty records, there were only two instances where this problem had arisen, checks undertaken by NASS Outreach staff confirmed that this was a potential problem. This problem is not helped by the fact that when ASYS and A-CID are matched, the original address on A-CID is masked by the ASYS address. It is probable that the address held on ASYS is that of the asylum seeker.

### *Risk:*

*The failure to indicate to the agencies that the asylum seeker has provided a private address means that the asylum seeker is likely to be provided with emergency accommodation at an end cost to NASS.*

### **Recommended Action No. 13:**

**We recommend that NASS request that the ASU stamp the IS96 as address verified, and instruct the agencies not to provide accommodation where the IS96 has been stamped. In doing this, the agencies are likely to pass over any queries to NASS for resolution; therefore it will be necessary for NASS to ensure that it has appropriate resources to deal with them.**

### **Recommended Action No. 14:**

**We recommend that when there is a mismatch of addresses between A-CID and ASYS, details of the original address masked by ASYS is retained on A-CID in an address history.**

## Corporate Governance at the Agencies

36. We noted that there was no requirement for the agencies to conform to accepted best practice for corporate governance, including a requirement to have an internal audit role. We were informed that The Refugee Council is in the process of establishing internal audit position.

### *Risk:*

*Were the agencies not to follow accepted best practice for corporate governance, there may a negative impact on the relationship between them and NASS especially as the overall aims of the agencies would appear to conflict with the role being undertaken by NASS.*

### **Recommended Action No. 15:**

**We recommend that any future agreements with the voluntary sector specify the requirement that they have in place appropriate corporate governance arrangements. There should also be the requirement that they demonstrate that they have good management arrangements by establishing an internal audit role**

**(this may be limited to those agencies receiving a grant above a specified amount).**

### **Approved List of Emergency Accommodation Providers**

37. Currently it is the responsibility of the voluntary sector to arrange contracts with emergency accommodation providers without recourse to NASS. However there have been problems with the integrity of a number of providers resulting from the sweeps or through particular issues such as The Refugee Council with Aspect Housing (Operation Crossroads) and RB S.O.S. Accommodation. There is no list of approved providers.
38. Aspect Housing, in addition to being an emergency accommodation provider to The Refugee Council, provided asylum seeker accommodation to the London Borough of Tower Hamlets under the interim scheme. Details are set out in our separate paper concerning Operation Crossroads and the London Borough of Tower Hamlets..

#### *Risk:*

*The reputation of NASS, as well as the agencies, is put at risk when problems with providers for whatever reason, come to light and which may be brought to the attention of the public through the media.*

#### **Recommended Action No. 16:**

**We recommend that a register of approved providers is established by the agencies in conjunction with NASS and other relevant parties. We understand that such a scheme is operated by local authorities in London listing approved accommodation used for homeless people. The accommodation is given a rating according to the services provided and the local authority where the property is located is responsible for ensuring that all the necessary legal requirements are met.**

### **Role of the NASS Voluntary Sector Contract Manager**

39. Under the terms of the agreements, the agencies have a responsibility to ensure that the emergency accommodation meets minimum requirements. Due to resource constraints of the agencies, we were informed that these checks are only being undertaken in an hoc manner. We also confirmed that up to now, NASS contract staff have not checked to ensure that the agencies are fulfilling their responsibilities under the terms of the grant agreements in this area
40. Furthermore the under the terms of the agreement, the agencies are required to have in place appropriate insurance arrangements. We understand that no checks have been undertaken to ensure that these arrangements are adequate.

*Risk:*

*In addition to that of the agencies, the reputation of NASS could also be at risk if:*

- *there is a failure of an accommodation provider to meet the minimum standards including health and safety requirements; and*
- *the agencies were not to have adequate insurance arrangements in place for any activity funded by NASS.*

**Recommended Action No. 17:**

**We recommend that the Voluntary Sector Contract Manager introduces, as part of his visits to the agencies, checks to ensure that:**

- **they are carrying out effective checks on emergency accommodation providers. Appendix B paragraphs 6.1 - 6.3 sets out the duties of the agencies to check that the accommodation provided meets minimum standards and complies with health and safety requirements; and**
- **they have appropriate insurance arrangements in place. Appendix A paragraph 6.1 sets out the responsibility of the agencies.**

**The NASS Housing Management Team may be able to provide pointers as to what the agencies should be doing to fulfil these requirements.**

**NASS Outreach Team Property Sweeps**

41. Documentation that supports the results of the programme of property sweeps undertaken by the Outreach Team is retained but in a somewhat ad hoc fashion. For example the London sweeps records are either in filing cabinet or out on someone's desks. We understand that management are considering the introduction of a 'database'.

*Risk:*

*Failure to implement a formal mechanism for maintaining the records of property sweeps, could mean that staff may be acting on incomplete information when dealing, for example with the agencies, or that the management of the sweeps programme would be less effective; this will become more important as the programme of sweeps is extended nationwide.*

**Recommended Action No. 18:**

**We recommend that the 'database' recording details of sweeps, is established. This will enable the NASS Outreach Team to manage the programme of sweeps more effectively and to ensure that the results are documented, so that NASS Outreach and other staff are made aware of the actions taken or to be taken against the agencies and/or the accommodation providers.**

## **NASS Outreach Staff based at Block Booked Emergency Accommodation Providers**

42. In London the NASS Outreach Team has based a number of its staff at three of the block booked emergency accommodation providers. Whilst there have been significant benefits from this innovation, it was noted that the teams are maintaining local 'databases' which, to varying degrees, are duplicating the records of ASYS and those of the providers. These 'databases' are updated locally whilst ASYS is updated centrally from documentation supplied by the staff located at the providers. It is probable that the data held on the local 'databases' is more accurate and up to date than the ASYS records.

### *Risk:*

*The introduction of an additional record could confuse the issue by adding yet another record of asylum seekers in emergency accommodation which holds different data from that held on ASYS.*

### **Recommended Action No. 19:**

**We recommend that NASS Outreach staff located at the key emergency accommodation providers are given access to ASYS so that the records can be updated on site. In the short term this may have to be achieved through daily downloads rather than through remote access.**

## APPENDIX 1

### **NASS: REVIEW OF THE MANAGEMENT OF ARRIVALS**

#### **System Objective**

To ensure that only destitute asylum seekers are provided with emergency accommodation and financial support once they arrive in the UK.

#### **Audit Objective**

To provide an assurance on the adequacy and effectiveness of the controls established for dealing with asylum seekers to the UK including the assignment of, and payments for, emergency accommodation.

#### **Scope**

This is one of six audits that will be carried out in NASS during this year. The other five audits will review dispersal accommodation, vouchers, terminations, interim scheme and the performance inspection team.

The boundaries of this review will be from the time an asylum seeker enters the UK until the asylum seeker is sent to either dispersal accommodation or until they state that they do not require NASS support. The scope will cover:

- a) processes and procedures for the management of emergency accommodation;
- b) availability of accommodation and the use of spot and block bookings;
- c) contracts with accommodation providers;
- d) claims from contractors including supporting documentation;
- e) maintenance of accurate records of asylum seekers by voluntary sector and NASS; and
- f) NASS records on ASYS.

#### **Methodology**

The work will broadly follow a systems based process whereby systems are identified and documented, controls evaluated and tested. An audit report will be produced identifying strengths and recommending areas for improvements as appropriate.

There will be monthly meetings with the system owners to discuss progress and other issues throughout the period of this review. We will also informally report key findings throughout the period of the review, usually at, but not limited to, the monthly meetings with the system owners.

#### **Reporting Arrangements**

Our emerging findings from the review will be presented to NASS at the end of fieldwork.

## **AUDIT AND ASSURANCE AIMS**

**The aim of Audit and Assurance is to provide an assurance to the Accounting Officer on the adequacy, reliability and effectiveness of the Department's internal control system.**

**Audit and Assurance also aims to help managers improve their efficiency and effectiveness by reporting on the internal control system for which they have responsibility.**

Home Office Audit and Assurance  
December 2001



## APPENDIX 2

## RECOMMENDED ACTION AND IMPLEMENTATION PLAN

Audit Review: NASS Arrivals

Date: August - November 2001

Ref: 61

Recommended Action & x-ref	Category (see key)	Recommended Action	Accepted Or Rejected	Management Response	Implementation Target Date
R 1, page 5	2	The legal position is investigated regarding the ownership of the voluntary sector databases and the records held under the grant agreement.	Accepted	NASS will take legal advice on this.	March 2002
R 2, page 5	2	Future agreements/contracts make specific reference to the procedures for the transfer of the service for the provision of emergency accommodation between service providers.	Accepted	With the introduction of Induction Centres, the need to move people around will be essential and this will be built into these agreements.	March 2002 onwards.
R 3, page 6	1	NASS introduces procedures, in conjunction with the agencies, to ensure that the NASS1s are completed on a timely basis. This could be achieved by requiring the agencies to submit by fax at the end of each day, a list of new arrivals into emergency accommodation. The information required would be the surname, forename and nationality (or as determined). This list could then be monitored by the NASS Registration Unit against the receipt of the completed NASS1s. Any missing forms could be followed up with the agencies.	Accepted	Induction Centres will mean that applications will be recorded much faster. Other procedures are now in place to ensure that those arriving in EA have completed NASS1s within the agreed timescales.	Completed
R 4, page 7	2	Where the claimant is a single person, greater use is made of the facility to set up a skeleton record on ASYS from the daily list submitted by the agencies as recommended in recommendation 3 above.	Rejected	Skeleton applications can cause problems in the NASS process and the preferred solution has been to remove the backlogs in these areas so that all cases are registered in good time.	N/A

Recommended Action & x-ref	Category (see key)	Recommended Action	Accepted Or Rejected	Management Response	Implementation Target Date
R 5, page 7	1	All agencies are required to use the ASYS generated reference number in their dealings with NASS. The agencies are sent an acknowledgement with the ASYS generated number confirming receipt of the NASS1.	Accepted	This will be accepted practice in Induction Centres and procedures are in place to ensure that the reference numbers are sent to the voluntary sector and that they are required to use them.	Completed
R 6, page 7	1	Data matching exercises are undertaken monthly and if possible extended to include all the agencies. Discrepancies should be investigated and the agreed numbers of asylum seekers in emergency accommodation should be used as the basis for estimate for the following months advance. The data matching should also be extended to the addresses held on the respective records.	Accepted	NASS has been matching data from the voluntary sector weekly and sending back reports with the NASS reference. They have been doing this for most of 2001. The current intention is that all databases will be agreed on an almost real time basis by the voluntary sector and NASS. This is being rolled out across all agencies until such time as Induction Centres are in place when the only database will be ASYS.	August 2002
R 7, page 8	1	The Refugee Council is required to align its database records of asylum seekers in emergency accommodation to those records held on ASYS. Any subsequent queries/differences can be investigated and, on resolution, the appropriate database updated.	Accepted	A major exercise has already occurred in London with the databases almost completely in line. This will be rolled out across all agencies as per the response above.	August 2002
R 8, page 9	1	Closer co-operation is fostered between the various teams and that all appropriate staff are kept informed of relevant issues, for example the Finance and Outreach Teams over	Accepted	Areas have continued to improve links with specified people in place in all sections.	March 2002

Recommended Action & x-ref	Category (see key)	Recommended Action	Accepted Or Rejected	Management Response	Implementation Target Date
		working with The Refugee Council. Desk instructions would help in providing the necessary communication lines.		Desk instructions are in process of being written and updated.	
R 9, page 9	2	NASS Finance monitor the actual costs incurred by the agencies for emergency accommodation against the advances made by fully utilising the request for emergency accommodation advance payment form. This will enable any overpayments to be clawed back by adjusting subsequent advances rather than wait until the year end.	Accepted	The request for payment form was set up to do this and is now used for this purpose.	Completed
R 10, page 10	1	As a matter of urgency, desk instructions are established to ensure that all staff are aware of their duties, to ensure consistency of application of procedures and to ensure continuity when staff changes occur. These should also include a more formal approach to training staff on the use of ASYS.	Accepted	This is now part of normal NASS routine and regular training and development is an essential part. NASS has asked for a formal training programme to be delivered for its staff.	Ongoing
R 11, page 10	2	In the longer term based on the proposed changes, formal documented policies and procedures should be in place prior to the introduction of the new arrangements.	Accepted	NASS has begun to move down this route but due to the speed of some changes this has not been possible. This is an ongoing aim.	Ongoing - end of 2002
R 12, page 10	2	Any future arrangements with the voluntary sector that their procedures meet the requirements of NASS to: <ul style="list-style-type: none"> <li>• ensure that all asylum seekers receive the same information and service no matter which agency deals with them;</li> <li>• ensure compliance with the service requirements set out in the agreements;</li> <li>• provide an interface with NASS's own policies and procedures; and</li> <li>• avoid the re-invention of the wheel.</li> </ul>	Accepted	This will be part of the Induction Centre process now being implemented and will give NASS much greater control over these areas.	Autumn 2002
R 13, page11	1	NASS request that the ASU stamp the IS96 as address	Rejected	NASS has now identified an	Completed for

Recommended Action & x-ref	Category (see key)	Recommended Action	Accepted Or Rejected	Management Response	Implementation Target Date
		verified, and instruct the agencies not to provide accommodation where the IS96 has been stamped. In doing this, the agencies are likely to pass over any queries to NASS for resolution; therefore it will be necessary for NASS to ensure that it has appropriate resources to do with them.		alternative approach whereby the paperwork from the ASU on asylum seekers will be passed onto the Induction Centres. Each asylum seeker will, at his/her interview, be specifically asked about details of any address given.	Dover. London from March 2002. To be rolled out as other Centres open.
R 14, page 11	2	When there is a mismatch of addresses between A-CID and ASYS, details of the original address masked by ASYS is retained on A-CID in an address history.	Accepted	Matching of addresses is not done through A-CID but through the Change of Address Team (CoAT). Daily reports are run. However due to design flaw in the batch file receipt from ASYS, this has not been effective. This has now been fixed. NASS is increasing its fraud and intelligence teams and they will use this as one source of information.	October 2002
R 15, page 11	2	Any future agreements with the voluntary sector specify the requirement that they have in place appropriate corporate governance arrangements. There should also be the requirement that they demonstrate that they have good management arrangements by establishing an internal audit role (this may be limited to those agencies receiving a grant above a specified amount).	Accepted	All grant agreements are being redrafted to tighten up requirements in general, including these areas. Some areas relating to this are already covered in the existing grant agreements, e.g. clauses 5.2 and 5.3.	June 2002
R 16, page 12	2	A register of approved providers is established by the agencies in conjunction with NASS and other relevant parties. We understand that such a scheme is operated by	Rejected	This is good practice, but NASS is not convinced that the voluntary sector currently have	October 2002

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		local authorities in London listing approved accommodation used for homeless people. The accommodation is given a rating according to the services provided and the local authority where the property is located is responsible for ensuring that all the necessary legal requirements are met.		the appropriate skills to vet their providers. NASS would probably be reluctant to provide this service for these third party suppliers. NASS will be addressing this in a slightly different way through the Induction Centres by specifying in much more detail NASS's expectations in regard to the standards and services expected of the voluntary sector to procure on our behalf. If all goes to plan, the need for spot-booked EA will disappear.	
R 17, page 13	2	<p>Voluntary Sector Contract Manager introduces, as part of his visits to the agencies, checks to ensure that:</p> <ul style="list-style-type: none"> <li>• they are carrying out effective checks on emergency accommodation providers. Appendix B paragraphs 6.1 - 6.3 sets out the duties of the agencies to check that the accommodation provided meets minimum standards and complies with health and safety requirements; and</li> <li>• they have appropriate insurance arrangements in place. Appendix A paragraph 6.1 sets out the responsibility of the agencies.</li> </ul> <p>The NASS Housing Management Team may be able to provide pointers as to what the agencies should be doing to fulfil these requirements.</p>	Accepted	The contract manager has and deficiencies identified have already been actioned. In addition, as noted above, the contract manager is in the process of specifying in much more detail NASS's expectations in this regard, so that a much more robust assessment of compliance can be made in the future.	October 2002
R 18, page 13	2	The 'database' recording details of sweeps, is established.	Accepted	The results of sweeps feed into	Autumn 2002

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		This will enable the NASS Outreach Team to manage the programme of sweeps more effectively and to ensure that the results are documented, so that NASS Outreach and other staff are made aware of the actions taken or to be taken against the agencies and/or the accommodation providers.		this, as does the information on new arrivals and those travelled. This will be rolled out as per previous statements. Again the introduction of Induction Centres will mean that this will no longer be required.	
R 19, page 14	2	NASS Outreach staff located at the key emergency accommodation providers are given access to ASYS so that the records can be updated on site. In the short term this may have to be achieved through daily downloads rather than through remote access.	Accepted	This is built into Induction Centre process and can be done through RAS laptops.	Autumn 2002

**KEY:**

Category 1: Weaknesses in control, which, *if not rectified immediately*, expose the Organisation/system to a high probability that the objectives will not be met.

Category 2: Weaknesses in control, which, *if not rectified as soon as possible*, expose the organisation/system to a probability that the objectives will not be met.