## **Improvement Proposals in External Audit Reports 2013-2019**

## Part 1 – Local or regional reports on the performance of Gwynedd Council

Annual Performance Appraisal of the Care and Social Services
 Inspectorate for Wales (CSSIW) 2013/14 - Local report to Gwynedd published October 2014

# Improvement Proposals arising from the report -

1. The Council has reduced the number of looked after children from 203 in 2012/13 to 185 in 2013/14. It has secured substantial improvement in its performance in terms of the timeliness of conducting reviews of LAC care plans, with 94.3% being carried out within statutory time-scales, compared with 75.4% in 2012/13. However, this remains below the average percentage in Wales (95.9%).

## Progress against improvement proposals

Children in care / statutory reviews

31/3/14 185

31/3/15 194

31/3/16 207

31/3/17 218

31/3/18 227

31/3/19 253

30/9/19 265

There has been a 43% increase in the number of children in care since 31/3/2014

	Number of reviews during the	Performance
	year	
	Conducted / Total	
2013/14	515 / 546	94%
2014/15	510 / 544	94%
2015/16	544 / 599	91%
2016/17	613 / 674	91%
2017/18	588 / 662	89%
2018/19	595 / 700	85%
2019/20 (6	329 / 379	87%
months)		

The above data shows a significant increase over a 6 year period in the number of children in the care of Gwynedd Council. This is in-line with the national pattern and reflects the increase in the need for the Service, and the change in the nature of the cases which come to the service's attention. The needs are more intense, and several complex matters have become apparent in the profile of looked after children, for example sexual exploitation, inappropriate sexual behaviour, self-harm, mental health etc. Each child and young person's care plan needs to be reviewed in accordance with statutory guidelines by an independent review officer.

As seen in the table above, there has been a significant increase in the number of review meetings over the years. Performance improved during the earlier years and then dropped during the periods where we see an increase in the number of children coming into care. The service's capacity, in terms of officers, has remained static since 2014 and therefore the performance has dropped because of an inability to reach all the recommendations within the statutory timetable.

The Service regularly challenges its performance in this area via the internal performance processes, and this information is included in the Cabinet Members' Performance Report. The department also keeps detailed records of the reasons why reviews are held outside the statutory timetable. The Service has also submitted a bid for additional resources for some years, including this year.

## Conclusion

Based on what is noted above, the Audit and Governance Committee is asked to agree that the improvement proposal above be noted as "completed".

Annual Performance Appraisal of the Care and Social Services
 Inspectorate for Wales (CSSIW) 2014/15 - Local report to Gwynedd published October 2015

#### Improvement Proposals arising from the report -

- 1. The Council has started to develop a mental health commissioning strategy, and mental health services will be a field where CSSIW will take follow-up steps in 2015-2016.
- 2. Assistance for Carers -

The Council assessed or reviewed the needs of 241 adult carers in 2014-2015, which is less than 298 carers assessed in the previous year. This is a cause for concern as the number of those caring for adults and who receive an assessment of their own needs has increased over the past four years in Wales, despite the fact that the number has been falling continuously in Gwynedd. The

number of adult carers assessed or re-assessed in their own right during the year in which a service was provided for them was 132.

3. Timeliness of child protection conferences -

The Council's performance in holding initial child protection conferences has improved slightly, but it is lower than the Wales average (85% compared with 93%). Also, a drop was seen in the Council's performance in holding statutory reviews and child protection review conferences. The loss of the child protection coordinator and staff sickness contributed to the drop in performance in these fields. The timeliness of child protection conferences is a field that still requires improvement. Also, the Council needs to maintain and improve the timeliness of LAC reviews, which are currently managed by the safeguarding and quality unit.

4. Timeliness of looked after children reviews -

The Council's performance in holding initial child protection conferences has improved slightly, but it is lower than the Wales average (85% compared with 93%). Also, a drop was seen in the Council's performance in holding statutory reviews and child protection review conferences. The loss of the child protection coordinator and staff sickness contributed to the drop in performance in these fields. The timeliness of child protection conferences is a field that still requires improvement. Also, the Council needs to maintain and improve the timeliness of LAC reviews, which are currently managed by the safeguarding and quality unit.

5. Timeliness of health assessments for looked after children -

The Council only made small improvements in the percentage of looked after children receiving health assessments during the year, and this remains substantially lower than the Wales average (51% compared with 81%).

## Progress against improvement proposals

1 & 2 – Since the provision in the fields of mental health and carers are matters which arise in subsequent reports, and because they also feature in the department's performance monitoring meetings, we are confident that the department has sufficient procedures in place to support this improvement proposal.

### 3&4 -

	Number of initial child protection	Performance
	conferences	
	Conducted / Total	
2013/14	120 / 145	83%

2014/15	134 / 157	85%
2015/16	163 / 188	87%
2016/17	129 / 147	88%
2017/18	122 / 149	82%
2018/19	110 / 143	77%
2019/20 (6	92 / 99	93%
months)		

	Number of child protection review	Performance
	conferences	
	Conducted / Total	
2013/14	248 / 256	97%
2014/15	267 / 279	96%
2015/16	241 / 282	85.5%
2016/17	239 / 261	92%
2017/18	253 / 281	90%
2018/19	251 / 268	94%
2019/20 (6	91 / 115	79%
months)		

The Council's performance in conducting initial child protection conferences has gradually improved over a period of years, apart from 2018/19 when illness led to our ability to maintain continuity in performance. This measure in regularly challenged and the departments keeps detailed records of why conferences are held outside the statutory timeline.

The Council's performance in conducting child protection review conferences has improved gradually over a number of years. This measure is also regularly challenged and the department is conscious of the reasons for being outside the timelines.

5

	Number of health	Performance
	assessments	
2013/14	125 / 272	46%
2014/15	130 / 257	51%
2015/16	171 / 284	60%
2016/17	198 / 291	68%
2017/18	196 / 302	65%
2018/19	186 / 312	60%
2019/20 (6	86 / 161	53%
months)		

The performance of this measure has improved over the period since the Council has been working closely with the Health Board. There is still room for improvement

but performance for the first 6 months of this year bodes well for the future. There has been a significant increase in the number of looked after children, and therefore in the number needing health assessments.

### Conclusion

Based on what is noted above, the Audit and Governance Committee is asked to agree that the improvement proposal above be noted as "completed".

 National review of care and assistance for people with learning disabilities (Joint-review carried out by the Care and Social Services Inspectorate Wales and the Health Care Inspectorate) - Local report for Gwynedd published June 2016

## Improvement Proposals arising from the report -

- 1. Strategic planning with health colleagues is needed in order to develop long-term aspirations and plans. A joint commissioning strategy should be developed between health and social services based on an analysis of needs.
- 2. The local authority should continue to develop and improve its communication with service providers, and include them in the work of drawing up a statement of the market's position and in discussions about a joint commissioning strategy with the health sector.
- 3. The local authority should review the way it safeguards people's rights where they are deprived of their liberty (DoLS) to ensure that human rights are supported and properly protected.

#### Progress against improvement proposals

Work to monitor the progress against the above improvement proposals is conducted via the performance monitoring meetings of the department, and by the Care Scrutiny Committee. This is continuous work, therefore from a governance viewpoint we believe that this receives sufficient scrutiny.

## Conclusion

Based on what is noted above, the Audit and Governance Committee is asked to agree that the improvement proposal above be noted as "completed".

 Asset management [Land and Buildings] - Local report to Gwynedd published October 2016

### Improvement Proposals arising from the report –

 The Council should lead the way by reopening discussions with local and regional partners regarding the development of a systematic way of joint asset planning, including opportunities to: agree on joint performance management systems, and use them; establish a joint property services provision body; establish a joint asset retention bodies.

### Progress against improvement proposals

Welsh Government lead on the regional partnership arrangements through the National Assets Working Group.

The Housing and Property Department is a member of the North Wales Regional Group which meet regularly to share and learn good practice from across Wales, but more importantly to develop working partnerships with workers form other public bodies and to identify opportunities to work together.

### Conclusion

Based on what is noted above, the Audit and Governance Committee is asked to agree that the improvement proposal above be noted as "completed".

5. **People Strategy** - Local report to Gwynedd published November 2016

### Improvement Proposals arising from the report –

- 1. Update all people management policies and the guidance for managers to reflect the new People Strategy.
- 2. Put a comprehensive corporate workforce plan in place.
- 3. Introduce the new evaluation process to all staff.

#### Progress against improvement proposals

- 1. A Working Conditions Project Group has been set up under the Human Resources Manager with the emphasis on ensuring that those working conditions align with the culture and working practices that we identify as 'Ffordd Gwynedd' (please refer to the Ffordd Gwynedd Plan 2019-22).
- 2. The Workforce Planning Project Group has been set up under the Human Resources Manager. The policy and implementation guidelines have been reviewed and strengthened, with a briefing note to managers. Further, new innovative plans to attract the talent and skills needed by the Council have been introduced e.g. Apprentices, manager of the future, specialists of the future.

3. The Council has adopted a process of continuous evaluation, rather than an annual evaluation. The consultation upon, and publication of a new job description, and the generic expectation of every manager, is a focus of this new evaluation process.

## Conclusion

Based on what is noted above, the Audit and Governance Committee is asked to agree that the improvement proposal above be noted as "completed".

 Risk Management - An assessment that is based on the risk of the Council's corporate arrangements - Local report to Gwynedd published January 2017

## Improvement Proposals arising from the report -

1. The Council's risk management arrangements would benefit from: developing a tracking or summary of risks document as part of its Corporate Risk Register; delivering greater consistency when determining and managing risks in papers and reports submitted to the Members; giving greater attention to the concept of 'willingness to face risk' in its work of managing risk; submit a Risk Strategy and Operations Handbook to comply with the Council's amended arrangements; train the officers and the Member about risk management as part of the wider initiative to raise awareness.

### Progress against improvement proposals

A further report was submitted to the Audit and Governance Committee on 19 July 2018 outlining the Council's vision for our risk management procedures, and also outlines, point by point, the work underway in order to respond to matters arising in the auditor's letter.

During the period since introducing the report, the Assistant Head of Finance (Revenue and Risk) and the Risk Co-ordinator and Insurance Manager have held talks with each department's management team in order to give guidance to update their risk register. In addition, the Chief Executive has raised the matter in the Management Group.

As a result, the departments have shared information with the Risk and Insurance Service in order for it to populate the Register in its new format on our IT system (iGwynedd). We await information from some departments, but the work will be completed shortly.

### Conclusion

Developing the risk management procedures is continuous work, and we believe that what has been accomplished thus far leads us to note that the above recommendations are "completed".

7. <u>Good governance when determining significant service changes</u> - Local report to Gwynedd published March 2017

### Improvement Proposals arising from the report –

1. Provide an opportunity for the scrutiny committees to review and challenge business cases in changes to services in a timely manner before the Cabinet makes a final decision.

## Progress against improvement proposals

There have been examples where business cases have been reviewed and challenged since the new arrangements were introduced in May 2017 but it would be fair to add that this was not always the case.

The review of the scrutiny structure arrangements has recently been undertaken with the Audit and governance Committee being asked to provide recommendations on the way forward to a meeting of the Council on December 19th 2019.

#### Conclusion

Based on what is noted above, the Audit and Governance Committee is asked to agree that the improvement proposal be noted as being "in progress".

8. Savings Schemes - Local report to Gwynedd published March 2017

### Improvement Proposals arising from the report –

- 1. Strengthen the financial planning arrangements by ensuring that delivery timetables in business cases are robust
- 2. Strengthen the financial planning arrangements by establishing a more corporate method of determining income opportunities

### Progress against improvement proposals

In recent years the council's departments have been responsible for proposing the savings plans for their service area, with the savings going through detailed challenge and scrutiny actions. By following this regime, by the end of 2018/19 96% of savings plans, over £25 million of the savings since 2015/16 were realised.

The realisation of the individual plans is the responsibility of relevant Cabinet Members, and members' performance reports, which are presented regularly to Cabinet meetings, detail the progress of individual savings plans within their portfolios, as the situation is at the time. The Cabinet Member for Finance has responsibility for keeping an overview of the whole picture and regularly reports to Cabinet meetings on progress.

In terms of financial planning arrangements to establish a more corporate approach to determining income opportunities, Cabinet members have already selected income headings for strategic consideration and further work is being undertaken to look at the detail.

### Conclusion

Based on what is noted above, the Audit and Governance Committee is asked to agree that the two improvement proposals be noted as being "in progress".

 Gwynedd Council – Overview and Scrutiny – Fit for the Future? - Local report to Gwynedd published September 2018

## Improvement Proposals arising from the report -

- 1. Further develop scrutiny forward work programing to:
  - provide a clear rationale for topic selection;
  - •being more outcome focussed and explaining this to the public; and
  - •ensure that the method of scrutiny is best suited to the topic area and the outcome desired, and consider more innovative methods for undertaking scrutiny activity.
  - 2. Review the type of scrutiny support required to enable the scrutiny function to respond to current and future challenges.
  - 3. Clarify the role of scrutiny committee members and officers in the service performance review meetings, ensuring that committee members challenge service performance appropriately and hold officers to account.

### Progress against improvement proposals

The review of scrutiny arrangements is ongoing. Three options have been drawn up by a working group of members and officers working collaboratively to try to ensure the most effective scrutiny arrangements for Gwynedd. The considerations

set out below, together with a number of other considerations, have informed the formulation of the options.

Workshops were held for all members to discuss the strengths and weaknesses of the various options and to comment further in order to sharpen the options and improve our arrangements. The work of the Working Group and the Scrutiny Forum will be reported to their Audit and Governance Committee on 28th November, and then to the full Council for a decision.

#### Conclusion

Based on what is noted above, the Audit and Governance Committee is asked to agree that the two improvement proposals be noted as being "in progress".

10. <u>The Service User Perspective – the Library Service – Gwynedd Council</u> -Local report to Gwynedd published November 2018

Improvement Proposals arising from the report –

1. Ensure there are effective arrangements to share information between librarybased staff and centrally located library service management.

### Progress -

Improving communication within the service has been identified by us as a staff team as a process that needs to be addressed as part of our implementation of the Ford Gwynedd way of working. Service and performance messages are now communicated to all individual staff. We have brought together staff groups this year in order to draw staff into decision making processes, and a programme of specific training has been undertaken during the year with all staff, as well as task groups, supported by the Learning and Development Service, and this is in addition to our in-house provision. The purpose of this programme is to empower staff, together with increasing the level of knowledge and skills.

The iGwynedd file sharing system is very helpful in facilitating the process. Team leader staff are encouraged to visit libraries on a weekly basis to encourage effective two-way communication. The Libraries Manager meets regularly with members of the library team individually, and also meets on a quarterly basis.

2. Communicate the outcomes of future consultations so that service users understand the issues raised and what the Council has done in response.

### **Progress**

We will consider and act on this recommendation with any major and significant consultation that we will undertake in the future that could have a fundamental impact on the service, and ensure better and more robust collaboration with the communications Unit to ensure that Service users receive follow-up information as a result of any changes made.

- 3. Improve the level of support provided to users of the mobile library service. In particular:
  - (a) where possible provide ICT equipment and internet access in mobile libraries to meet the needs of library service users; and
  - (b) explore how the service might be used to enable rural residents to access other Council services.

#### **Progress**

- (a) We have provided a tablet with 3G connectivity at Arfon, Dwyfor and Meirionnydd mobile libraries. This will enable Internet connectivity, but we cannot guarantee consistent and regular contact in all geographical areas because of the current broadband access restrictions in Gwynedd.
- (b) The 3G link will enable access to the Gwynedd Council website which will enable our staff to signpost people to the right information or resources. We are currently in the process of reviewing our mobile library service in order to better identify those users who are frail and eligible under the Home Service category. The Home library service is a regular link with the most vulnerable residents in our society, and our drivers can be an important link between other council services in terms of connection or onward referral. We are in the process this year to organise a more focused training programme for the Home library service drivers to equip them to respond to support opportunities or signpost information.

We also, following discussion between the Information, Advice and Support service, offer home visits from Librarians for digital sessions, to facilitate digital engagement and inclusion, improve well-being and access to services and information from home.

#### Conclusion

Based on what is noted above, the Audit and Governance Committee is asked to agree that the two improvement proposals be noted as being "in progress".

 HR Information System – Gwynedd Council - Local report to Gwynedd published November 2018

Improvement Proposals arising from the report –

Review and strengthen project management arrangements:

- (i) Create a formal Project Initiation Document, based on the Project Board Terms of Reference, containing reference to all key project activities and documentation.
  - <u>Progress</u> A formal project set up document has been created which is based on formal project methodology and refers to all key project activities and documents. The Assistant Head of Corporate Support is leading the project with the help of a Project Manager and members of the Project Group.
- (ii) Clarify the project timeline to avoid the risk of 'always developing never getting there'.
  - <u>Progress</u> Setting a definite timetable for the project is not possible. This is due to the evolving nature of the work and the need to continually develop and update. However, regular progress meetings are held with an ongoing challenge to deliver in the most effective way possible.
- (iii) Review the layout of the project risk matrix to reduce the potential to mark all risks as medium.
  - <u>Progress</u> The risk matrix used initially reflects the Council's risk scoring matrix.
- (iv) Establish a formal Communications Strategy or Plan and publish regular highlight reports. Involve the Council's Communications Team in identifying a suitable name or brand identity for SGG and the HR systems suite.
  - <u>Progress</u> Each module within the Project Plan has its own communications plan that is consistent with the 'Self Service' brand.
- (v) Establish a formal benefit realisation programme so the aims of the development project can be properly evaluated
- (vi) <u>Progress</u> Measuring the impact of these developments is overseen by the Project Group. Currently, the information collected is largely based on management data.
- 2. Review technology options within the project
  - (i) Improve access to enable more staff (for example those remotely based) to engage with the system.
    - <u>Progress</u> The percentage of staff who have access to self-service has increased from 44% in May 2019 to 68% by the end of October

this year. The technology for universal access is in place, which means that the focus is now on reaching those staff who need further instructions to ensure access. That work is already happening.

- (ii) Network with other councils to gather and share practice examples. <u>Progress</u> - Networking and discussing developments with other organisations is ongoing. Examples include the North Wales Human Resource Officers Group and the National Group of Heads of Human Resources.
- (iii) Consider a cloud implementation.

  Progress As part of ongoing work by the Information Technology Service to improve provision for Gwynedd residents, an independent review of Gwynedd Council's arrangements and reliance on its data centres was commissioned. The main scope of the report was to receive guidance on proposed changes following the failure of the main data centre back in 2018. A number of technical solutions for local data centres (private cloud) and use of the public cloud were compared. The result of the report was confirmation that the Council's direction on changes that had been or were being made were offering significant improvements to the elasticity of our systems in a cost effective way. It was noted that the Council made use of the public cloud for some provisions, but it would not be cost effective to move everything to the cloud.

### Conclusion

Based on what is noted above, the Audit and Governance Committee is asked to agree that the improvement proposals 1(i), 1(ii), 1(iii), 1(iv), 2(ii) and 2(iii) be noted as being "completed", and that the improvement proposals 1(v) and 2(i) are noted as "in progress".

12. <u>Review Report: Homecare Services in Gwynedd</u> - Local report to Gwynedd published January 2019

### <u>Improvement Proposals arising from the report –</u>

1. Staff Training (regulation 16 (2)(a)). We saw that the frequency of staff training was inconsistent and staff training records had not been updated. The idea of providing a consistent and equal level of training for staff was also recommended at the last inspection. We have not served notice on

this occasion as we did not find that this had a negative impact on the wellbeing of the people or the development of staff. All staff we spoke to told us that they felt that training provision could be improved and this was recognised by the management team.

- 2. Quality of Service report (regulation 23 (1), (2) and (3)). We saw that the service had not completed an annual report on the quality of the service and had not consulted with people using the service or their representatives. We have not served notice on this occasion as we did not find that this had a negative impact on the well-being of the people or the care and support provided.
- 3. Service delivery plans and risk assessments need to be reviewed in a timely manner.
- 4. The service needs to improve the way it documentation and records formal and informal discussions with families/representatives and staff. This will ensure that a clear audit trail can be followed.
- 5. Ensures that staff receive formal timely and consistent supervision sessions and an annual appraisal and keep an up-to-date record of the meetings held.
- 6. The service information leaflet needs to be updated and it needs to include the correct CIW contact details.

## Progress against improvement proposals

The Adults, Health and Well-being Department has received this report and will assess its content in more detail jointly with the Cabinet Member, to see how these recommendations are relevant to the work of Gwynedd Council as we provide a service to our residents.

#### Conclusion

Based on what is noted above, the Audit and Governance Committee is asked to agree that all the improvement proposals above be noted as "in progress".

<u>Well-being of Future Generations: An examination of 'Establishing a New Youth Service to Support Young People' – Gwynedd Council</u> - Local report to Gwynedd published September 2019

Improvement Proposals arising from the report –

- Despite responding to service users' views, the Council's approach is mostly reactive and driven by a changing operating context – specifically, financial constraints. The Council's perception of the benefits of establishing a scalable operating model is mostly centred on helping it to respond more easily to budgetary pressures.
- 2. Data sources used to inform the new model mostly focused on understanding the needs of current service users with little use of data to model future demand on the service
- 3. The newly remodelled mobile service has greater ability to 'pop-up' as and where needed and can therefore be more dynamic in responding to social issues identified and help to prevent them escalating
- 4. Increasing the effective use of data will give the Council a better understanding of the root causes of issues and demand on the service. This will help the Council to widen the scope of its thinking and have a more holistic approach to early intervention and prevention.
- 5. There is little evidence to reflect that the Council has considered how the step contributes to its wider well-being objectives, those of its partners, or the seven national well-being goals. The Council lacked an integrated approach in remodelling its youth service. Despite the Council and partners' well-being objectives not being established when the remodelling began, the financially driven, reactive nature of its approach meant that wider priorities were not effectively considered.
- 6. The Council places great emphasis on applying its 'citizen-focused' approach 'Ffordd Gwynedd' in implementing the step. However, in the step reviewed, the Council cannot demonstrate that 'Ffordd Gwynedd' fully incorporates the sustainable development principle and the five ways of working. Doing so would facilitate greater integration.
- 7. Despite creating more opportunities for collaboration on an operational level, the Council cannot demonstrate its consideration of how to strategically work with partners in delivering the step. This reflects our findings in relation to integration.
- 8. One partner reported a negative shift in engaging with the Council's newly remodelled youth service, impacting adversely on the partners' objectives and preventative activities. Again this reflects our findings in relation to integration.
- 9. The absence of a clear message communicating the intention to close all the existing youth clubs in the 'Gwynedd Youth Service for Tomorrow' video is a key weaknesses in how the Council communicated potential changes to service users and citizens.

Progress against improvement proposals

The Council has noted its wish to seek further discussion with the Wales Audit Office on the conclusions and improvement opportunities of the above report. Please refer to the minutes of the Council meeting dated 3 October 2019.

## Conclusion

Based on what is noted above, the Audit and Governance Committee is asked to agree that all the improvement proposals above be noted as "in progress".

### Part 2 – national or general reports relevant to local government

 Good Scrutiny? Good Question - National Report by the Wales Audit Office published May 2014

## Improvement Proposals arising from the report –

- 1. Explain the roles of executive members and senior officers in contributing to the scrutiny process.
- 2. Ensure that scrutiny members, specifically scrutiny chairs, receive training and assistance in order to ensure that they possess all skills required to conduct effective scrutiny work.
- 3. Further develop scrutiny forward planning processes in order to:
  - Prepare a clear logic for selecting subjects
  - Focus more on outcomes
  - Ensure that the most suitable scrutiny method for the subject field and the desired outcome is used.
- 4. Reconcile scrutiny programmes and performance management, self-evaluation and Council improvement arrangements.
- 5. Ensure that the impact of scrutiny is appropriately appraised and that it is implemented in order to improve the function; including conducting follow-up work on proposed actions and auditing results.
- 6. Carry out regular self-evaluations of scrutiny arrangements by using the 'effective outcomes and features of effective overview and scrutiny arrangements for local government' developed by the Wales Scrutiny Officers Network.

### Progress against improvement proposals

The proposals included in the above report have, in truth, been included in the consequent report – 'Gwynedd Council – Overview and Scrutiny – Suitable for the Future?' published in June 2018, and are a continuous consideration to the scrutiny system in the Council.

## Conclusion

Based on what is noted above, the Audit and Governance Committee is asked to agree that all the improvement proposals above be noted as "completed".

 Delivering with Less - the impact on environmental health services and citizens - National Report by the Wales Audit Office published October 2014

### Improvement Proposals arising from the report -

- 1. Amend the best practice standards in order to:
- reconcile work in the environmental health field,
- note the more extensive contribution of environmental health towards achieving the strategic priorities of Welsh Government,
- note the benefits and impacts of environmental health services in terms of safeguarding citizens.
- 2. Engage better with local residents regarding plans to cut budgets and change services by:
- consulting with residents on the proposed changes in services and use the findings to drive decisions;
- outline which services will be cut and how these cuts will affect residents, and
- note plans to increase payments to change service standards.
- 3. Improve efficiency and value for money by:
- Noting the statutory and non-statutory duties of Councils' environmental health services
- Agreeing on environmental health priorities for the future and the role of councils when delivering these
- Determining an 'acceptable standard of performance' for environmental health services (maximum and minimum) and publicise them amongst citizens
- Improving efficiency and maintaining performance on the agreed level by doing the following
- Collaborating and/or integrate with others in order to reduce costs and/or improve quality
- Awarding services on external contracts where they can be provided in a more cost-effective way in accordance with the standards agreed upon
- Introducing and/or increasing payments and focusing on activities that generate income
- Using grants in a strategic way in order to ensure the greatest impact and profit

- Reducing activities in order to focus on core statutory and strategic priorities.
- 4. Improve strategic planning work by:
- noting, gathering and analysing financial data, data on performance and data on demand/need in relation to environmental health services;
- analysing the data gathered in order to drive and understand the relationship between 'cost:benefit:impact' and use this information as grounds to decisions on Councils' health services in the future;
- agree how digital information can be used to plan and develop environmental health services in the future.

### Progress against improvement proposals

- Work has been underway on a national level to amend the best practise standards in consultation with the WLGA.
- Councils work together in areas where obvious gains in doing so have been identified.
- The Department's Management Team continuously reviews how we meet our citizens' needs.
- The Head of Department regularly discusses the challenges of maintaining the service with the Cabinet Member, in order to ensure that resources are effectively prioritised.
- The efficiency of the service that we provide is regularly challenged, via the performance monitoring meetings, by the Cabinet Member and the Chief Executive.

### Conclusion

Based on what is noted above, the Audit and Governance Committee is asked to agree that all the improvement proposals above be noted as "completed".

 Helping People to Live Independently: Do Councils Do Enough? - National Report by the Wales Audit Office published October 2015

## Improvement Proposals arising from the report -

- 1. Improve the engagement and information for older people and the arrangements for disseminating that information.
- 2. Ensure effective management of the performance of the range of services assisting older people to live independently.

## Progress against improvement proposals

This work is ongoing and we will be submitting further information in the next update report to this committee.

#### Conclusion

Based on what is noted above, the Audit and Governance Committee is asked to agree that all the improvement proposals above be noted as "in progress".

Community Safety in Wales - National Report by the Wales Audit Office published October 2016

## Improvement Proposals arising from the report -

- Improve strategic plans in order to better co-ordinate community safety by establishing a national strategy supported by regional and local plans that focus on achieving community safety priorities agreed on a national level, instead of the existing planning framework.
- Improve strategic work with partners by formally creating effective safety community boards instead of the existing community safety structures, that formalise and unify the work of Welsh Government, the Police, local authorities, the health boards, the fire and rescue authorities, WACSO and other key stakeholders.
- 3. Ensure that community safety performance is effectively managed by: setting appropriate measures on every level in order to enable members, officers and the public to judge the progress of completing actions for community safety services; ensure that the information on performance includes the work of all relevant agencies; establish measures to judge the inputs, outputs and the impact in order to be able to understand the effect of investment decisions and to support the scrutiny and overview work.

# Progress against improvement proposals

- 1. Welsh Government has created a Review Board in order to improve elements of community safety and the work programmes are monitored by the Welsh Government. We await the National Plan.
- 2. Gwynedd and Anglesey Community Safety Board has developed a local plan which is based on the regional and national priorities.

3. The Board has placed measures against each of the 7 priorities in the local plan, and monitoring and performance reports are assessed quarterly. The plan can be seen on the Council's website.

### Conclusion

Based on what is noted above, the Audit and Governance Committee is asked to agree that improvement proposals 2 and 3 above be noted as "completed", and improvement proposal 1 be noted as "in progress".

 Public Procurement in Wales - National Report by the Wales Audit Office published October 2017

## Improvement Proposals arising from the report –

1. It was clear from our sampling that some procurement strategies are out-of-date and there has also been a mixed response to new policy and legislation such as the Well-being of Future Generations (Wales) Act 2015. We recommend that public bodies review their procurement strategies and policies during 2017-18 and on an annual basis thereafter to ensure that they reflect wider policy and legislative changes and support continuous improvement.

### Progress against improvement proposals

The Council's Procurement Strategy is highlighted in the Council Plan as one of the key priorities to create a viable and prosperous economy. The Council have established performance measures to see how the Council's procurement results in 'keeping the benefits local'. The Council's latest performance can be seen on the site below:

https://www.gwynedd.llyw.cymru/en/Council/Strategies-and-policies/Corporate-plans-and-strategies/Procurementpolicies.aspx

We have also applied the Well-being Act to the commissioning and procurement approaches by incorporating the well-being goals and the five ways of working to the Council's Sustainable Procurement Policy. This Procurement Policy was approved by the Council's Cabinet on 23 July 2019. A copy of the policy is also available on the link above.

### Conclusion

Based on what is noted above, the Audit and Governance Committee is asked to agree that all the improvement proposals above be noted as "completed".

6. How Local Government Manages Demand – Homelessness - National Report by the Wales Audit Office published January 2018

### Improvement Proposals arising from the report –

- 1. We recommend that local authorities:
  - ensure their staff are sufficiently skilled to deal with the new demands of mediating, problem solving, negotiating and influencing with homeless people; and
  - review and reconfigure their services to engage more effectively with homeless and potentially homeless people to prevent homelessness.
- 2. We recommend that local authorities review their funding of homelessness services to ensure that they can continue to provide the widest possible preventative approach needed. Reviews should consider use of Supporting People as well as General Council fund monies to support delivery of the authority's homelessness duties.
- 3. We recommend that local authorities:
  - design services to ensure there is early contact with service users;
  - use 'triage' approaches to identify and filter individuals seeking help to determine the most appropriate response to address their needs; and
  - test the effectiveness of first point of contact services to ensure they are fit for purpose.
- 4. We recommend that local authorities publish service standards that clearly set out what their responsibilities are and how they will provide services to ensure people know what they are entitled to receive and what they must do for themselves. Service standards should:
  - be written in plain accessible language;
  - be precise about what applicants can and cannot expect, and when they can expect resolution:
  - clearly set out the applicant's role in the process and how they can help the process go more smoothly and quickly;
  - be produced collaboratively with subject experts and include the involvement of people who use the service(s);
  - effectively integrate with the single assessment process;
  - offer viable alternatives to the authority's services; and
  - set out the appeals and complaints processes. These should be based on fairness and equity for all involved and available to all.

- 5. To improve current performance we recommend that local authorities make better use of their websites to help manage demand by:
  - testing the usability and effectiveness of current website information using our lines of enquiry set out in Appendix 5;
  - increasing and improving the range, quality and coverage of web based information; making better use of online applications; and
  - linking more effectively to information from specialist providers' and advice specialists, such as Citizens Advice.
- 6. We recommend that local authorities set out and agree their expectations of partners identifying how they will work together to alleviate homelessness. The agreement should be reviewed regularly and all partners' performance reviewed to identify areas for improvement.
- 7. We recommend that local authorities address weaknesses in their equalities monitoring, and ensure that their homelessness service accurately records and evaluates appropriate data to demonstrate equality of access for all service users that the local authority has a duty towards.
- 8. We recommend that local authorities use the checklist set out in Appendix 10 to undertake a self-assessment on services, to help identify options to improve how they can help manage demand.

### Progress against improvement proposals

- 1. Staff have received Training on the new Legislation, as well as motivational interviewing, hoarding, defend possession cases, Universal Credit, understanding substance misuse problems, and mental health. Engagement arrangements are part of the Council's new Housing Strategy and will therefore become part of the core work of the Service going forward.
- Supporting People funding already funds several homelessness prevention projects: Prisoner Resettlement Scheme (2018 to 2020); Intensive Support Scheme For people with complex needs; Drop in Service for young people and people coming out of prison. The Service has also recruited one new member of staff to help deal with increased demand.
- 3. The Housing Options service provides a 'triage' service to filter individuals, and there is an agreement with the Housing Associations for early referral of people threatened with homelessness. In the future, the Service will review how effective these arrangements are.

- 4. The Service has had discussions with Shelter Cymru's 'Take Notice' project, and a paperwork and information review of the homelessness strategy action plan is due to take place in January 2020.
- 5. Website development work on Homelessness strategy action plan- underway January 2020.
- 6. Review of contracts with Housing Associations will take place from January 2020.
- 7. Some of the information is already collected, but the assessment form needs to be amended to include all the equality information. This will also form part of the homelessness strategy action plan which will be in place from January 2020.
- 8. The checklist is already in use.

#### Conclusion

Based on what is noted above, the Audit and Governance Committee is asked to agree that the improvement proposals 2 and 8 be noted as "completed", and that improvement proposals 3, 4, 5, and 6 are noted "in progress".

7. **Housing Adaptations** - National Report by the Wales Audit Office published February 2018

Improvement Proposals arising from the report -

- 1. We recommend that local authorities work with partner agencies (health bodies, housing associations and Care and Repair) to strengthen their strategic focus for the provision of adaptations by:
  - setting appropriate strategic objectives for adaptations that focus on wellbeing and independence;
  - improving the quality of information on the demand for adaptations by using a wide range of data to assess need including drawing on and using information from partners who work in the local-authority area; and
  - linking the system for managing and delivering adaptations with adapted housing policies and registers to make best use of already adapted homes.
- 2. We recommend that delivery organisations provide information on housing adaptations in both Welsh and English, and accessible formats including braille, large fonts, audio versions and other languages. Information should be promoted widely via a range of media including social media, websites and published information, and also through key partners. Preferably, information should be

- produced jointly and policies aligned between delivery bodies to improve coverage and usage.
- 3. Given the wide number of routes into services, delivery organisations need to ensure they have robust systems to deal effectively and quickly with applications. However, we found that the processes used by delivery organisations vary widely and often create difficulties for disabled and older people seeking assistance (paragraphs 2.16 to 2.19). We recommend that delivery organisations streamline applications by creating single comprehensive application forms covering all organisations within a local authority area that are available via partners and online.
- 4. Delivery of adaptations can be delayed by a variety of factors (paragraphs 2.20 to 2.33). To improve timeliness in delivery we recommend that:
  - the Welsh Government reviews whether local authorities should continue to use the means test for Disabled Facilities Grants (DFGs);
  - local authorities provide or use home improvement agency services to support disabled and older people to progress their DFG applications efficiently;
  - delivery organisations work with planning authorities to fast track and streamline adaptations that require approvals;
  - delivery organisations use Trusted Assessors to undertake less complex adaptation assessments; and
  - the Welsh Government streamlines its approval processes for Physical Adaptation Grants (PAGs).
- 5. We recommend that delivery organisations:
  - introduce formal systems for accrediting contractors to undertake adaptations. These should include:
  - standards of customer care such as keeping to appointments, keeping the site tidy, controlling noise etc;
  - vetting of financial standing, tax and VAT status;
  - promoting good health and safety practices;
  - requiring the use of warranty schemes:
  - ensuring that adequate insurance is held; and
  - requiring references.
  - use framework agreements and partnered contracts to deliver adaptations.
  - address weaknesses in the contracting of adaptations, updating Schedule of Rates used to tender work and undertaking competitive tendering to support value for money in contracting.
  - develop effective systems to manage and evaluate contractor performance by:
  - setting an appropriate range of information to judge performance and delivery of works covering timeliness of work; quality of work; applicant/ tenant feedback; cost of work (including variations); health and safety record; and customer feedback;

- regularly reporting and evaluating performance to identify opportunities to improve services; and
- providing formal feedback to contractors on their performance covering key issues such as client satisfaction, level and acceptability of variations, right first-time work, post-inspection assessment and completion within budget and on time.
- 6. We recommend that local authorities work with partner agencies (health bodies, housing associations and Care and Repair) to develop and improve joint working to maximise both take-up and the benefits of adaptations in supporting independence by pooling of resources, co-locating staff and creating integrated delivery teams.
- 7. To enhance take-up and usage of adaptations with health bodies we recommend that delivery organisations jointly agree and publish joint service standards for delivery of adaptations within each local-authority area. The service standards should clearly set out how each agency approaches delivery of adaptations and how they will provide services to ensure people know what they are entitled to receive. Service Standards should:
  - be written in plain accessible language;
  - be precise about what people can and cannot expect to receive;
  - be produced collaboratively to cover all adaptations services within an area;
  - set out the eligibility for the different funding streams, application and assessment processes, timescales and review processes; and
  - offer the viable options and alternatives for adaptations including linking with adapted housing registers to maximise use of already adapted homes.

# Progress against improvement proposals

This work is ongoing and we will be submitting further information in the next update report to this committee.

#### Conclusion

Based on what is noted above, the Audit and Governance Committee is asked to agree that all the improvement proposals above be noted as "in progress".

 Speak my language: Overcoming language and communication barriers in public services - National Report by the Wales Audit Office published April 2018

Improvement Proposals arising from the report –

Public bodies are required to ensure that people can access the services they need. To take account of the requirements of the 2010 Equality Act and other legislation, we recommend that public bodies regularly review the accessibility of their services to people who do not speak English or Welsh as a main language including Deaf people who use sign language. This assessment can include using our checklist.

### Progress against improvement proposals

The Council has developed a Strategic Equality Plan 2020-24, with the draft version being presented to the Cabinet on 26 November requesting a public consultation on its contents. The Council's internal arrangements to consult with residents regarding any barriers they may face when dealing with the Council receives attention in the Plan.

#### Conclusion

Based on what is noted above, the Audit and Governance Committee is asked to agree that all the improvement proposals above be noted as "in progress".

 Strategic Commissioning of Accommodation Services for Adults with <u>Learning Disabilities</u> - National Report by the Wales Audit Office published May 2018

Improvement Proposals arising from the report –

- 1. We recommend that local authorities continue to focus on preventing people becoming dependent on more expensive placements in care homes by providing effective support at home and a range of step up accommodation by:
  - improving the evaluation of prevention activity so local authorities understand what works well and why;
  - utilising the mapping of prevention services under the Social Services and Well-being (Wales) Act 2014 that covers other agencies and service providers;
  - improving the signposting of additional help so carers and support networks can be more resilient and self-reliant. This should include encouraging carers to make long-term plans for care to maintain and protect their dependant's wellbeing; and
  - sharing risk analysis and long term planning data with other local authorities, service providers, and partners to agree a shared understanding of the range of options.
- 2. We recommend that local authorities improve their approach to planning services for people with learning disabilities by building on the Regional

Partnership Boards population assessments for people with learning disabilities and agreeing future priorities.

- 3. We recommend that local authorities do more to integrate commissioning arrangements with partners and providers and take account of the work of the National Commissioning Board by:
  - understanding the barriers that exist in stopping or hindering further integration;
  - improving the quality of joint strategic plans for learning disability services (see also paragraphs 3.11-3.14);
  - establishing investment models and sustainable financial structures, joint workforce planning and multi-year budgeting; and
  - developing appropriate governance and data sharing frameworks with key local partners that include a clear process for managing risk and failure.
- 4. We recommend that local authorities do more to involve people with learning disabilities and their carers in care planning and agreeing pathways to further independence by:
  - consistently including people with learning disabilities and their carers in the writing, monitoring and development of care plans;
  - systematically involving carers and advocacy groups in evaluating the quality of services;
  - involving people with learning disabilities in procurement processes; and
  - ensuring communications are written in accessible and appropriate language to improve the understanding and impact of guidance and information.
- 5. We recommend that local authorities collaborate with providers, the third sector and suppliers in understanding challenges, sharing data, and pooling expertise by:
  - improving the quality range, and accessibility of tendering information; and
  - working with providers to shape local markets by coming to a common understanding of the opportunities, risks, and future priorities in providing learning disabilities services.
- 6. We recommend that local authorities develop a more appropriate set of performance indicators and measures of success that make it easier to monitor and demonstrate the impact of service activity by:
  - co-designing measures, service and contract performance indicators with service providers, people with learning disabilities and their carers;
  - ensure commissioners have sufficient cost and qualitative information on the full range of placement and care options available;
  - equipping commissioners with data to demonstrate the long term financial benefits of commissioning choices, this includes having the right systems and technology;

- integrating the outcomes and learning from reviews of care plans into performance measures;
- evaluating and then learning from different types of interventions and placements; and
- including learning disability services in local authority scrutiny reviews to challenge performance and identify improvements.

### Improvement Proposals arising from the report –

Responding to all the above improvement proposals is part of the work involved in completing the projects in the Council's Plan, 'Redesigning our Care Services','Community Resilience' and 'The Workforce and Recruitment within the field of Care'. This work is done collaboratively with a number of partners through the Area Teams.

Monitoring progress of these proposals happens through the Department's performance monitoring arrangements, and in the Care Scrutiny Committee. This is ongoing work, so in terms of governance and appropriate arrangements, we believe that this work is properly managed.

#### Conclusion

Based on what is noted above, the Audit and Governance Committee is asked to agree that all the improvement proposals above be noted as "in progress".

10. <u>The Effectiveness of Local Planning Authorities in Wales -</u> National Report by the Wales Audit Office published June 2019

Improvement Proposals arising from the report -

- 1. Local planning authorities:
  - (i) test current engagement and involvement practices and consider the full range of other options available to ensure involvement activities are fit for purpose;
    - <u>Progress</u>: A review of the Development Control Service is in the process of being undertaken with the objective of ensuring that the customer/citizen is central to how the service is delivered. The review has included engagement with customers to obtain its views on the service and information about their needs from the service. The service will be redesigned to ensure that it is more resilient, meets its purpose and meets customer needs. From a planning policy perspective we have been preparing a set of supplementary planning guidance by taking advice from the Council's communications service in terms of engagement and

ensuring that the arrangements meet statutory requirements as well as national guidance relevant to methods of engagement and consultation. It is therefore believed that the Council is acting on this.

(ii) use 'Place Plans' as a vehicle to engage and involve communities and citizens in planning choices and decision making; and

<u>Progress</u>: The Joint Local Development Plan (Gwynedd and Anglesey) was adopted in July 2017 and the emphasis on this has been on preparing supplementary planning guidance and putting in place monitoring arrangements for the preparation of the scheme's first annual monitoring report. Therefore, 'Place Plans' have not been prepared by the Council at this stage, but the Joint Planning Policy Service would provide support to any party wanting to prepare a place plan, subject to the provision of appropriate resources.

(iii) improve transparency and accountability by holding planning meetings at appropriate times, rotating meetings to take place in areas which are subject to proposed development, webcasting meetings and providing

<u>Progress</u>: This is already being implemented with planning committee meetings taking place in Caernarfon, Pwllheli and Dolgellau – dependent on the location of planning applications. Arrangements which provide third parties with the right to speak in planning committees have also been in place for some time. Web broadcasting provision is also in place.

To improve resilience, we recommend that local planning authorities:
 review their building control fee regimes to ensure the levels set, better reflect the actual cost of providing these services and make the service self-funding;

Progress: Fees on planning applications is a matter for the Welsh Government and it is noted that those fees have not risen for some years. The Council has always provided a service advising on submitting an application and recovering these costs through discretionary fees, before this became statutory with statutory fees attached. The Council as a joint local planning authority with other LPAs - through the Planning Officers Society for Wales (in partnership with the Welsh Government) – has been working on a cost recovery project for providing a planning service. The second part of a project commissioned by the Welsh Government (and supported by the Planning Officers Society for Wales) has slipped in terms of timescale. It is noted that planning policy work and planning enforcement are not elements of the work that bring fees.

and

- improve capacity by working regionally to:
- (i) integrate services to address specialism gaps;

<u>Progress</u>: It is believed that the Council is already doing this considering that we have a Joint Planning Policy Service with Anglesey since 2011 and as a result, Joint Local Development Plan – the only example in Wales. We are also part of the regional arrangement for the provision of a waste mineral planning service in North Wales, which is being led by Flintshire. Also, the North Wales Planning Officers Group has been looking at several other areas of work over the years including building conservation and the natural environment, and leading on these issues nationally.

(ii) develop joint supplementary planning guidance;

<u>Progress</u>: 4 Joint Supplementary Planning Guidance documents have been adopted with work progressing on a series of other guidance documents.

(iii) develop future local development plans regionally and in partnership with other local planning authorities.

<u>Progress</u>: We have already prepared a joint local development plan, joint supplementary planning guidance and an annual joint monitoring report.

- 3. We recommend that local planning authorities improve the effectiveness of planning committees by:
- (i) reviewing their scheme of delegation to ensure planning committees are focussed on the most important strategic issues relevant to their authority;

<u>Progress</u>: We have already acted on this with a new delegation scheme adopted by the Council in May 2018. This is now being monitored and the evidence currently shows that the number of applications that need to be reported to a committee has fallen. This may involve reducing the number of Planning Committee meetings per year from 15 to 12 – but we will continue to monitor for now.

- (ii) revising reporting templates to ensure they are clear and unambiguous to help guide decision making and reduce the level of officer recommendations overturned; and Progress: Planning reports are thought to be comprehensive but clear and we have not had any complaints from customers indicating otherwise. It must be notes that as part of our internal performance monitoring arrangements we liaise with customers to obtain their views and the feedback is generally very positive. It is also noted that we have standard arrangements in place in the Committee to refer an application to a "cooling off period" if it is considered that there are risks associated with the Committee's decision.
  - (iii) enforcing the local planning authorities' standards of conduct for meetings.

<u>Progress</u>: We train consistently on issues of propriety and lobbying. The Committee will also, through the Chair, ensure compliance with the Council's constitutional requirements with a solicitor present on behalf of the monitoring officer at each meeting to advise.

### Conclusion

Based on what is noted above, the Audit and Governance Committee is asked to agree that the improvement proposals 1(i), 2, 2(i), 2(iii), 3(ii) and 3(iii) above be noted as "completed", and that the improvement proposals 1(i), 1(ii), 2(ii) and 3(i) above be noted as "in progress".

11. <u>The 'Front Door' to Adult Social Care -</u> National Report by the Wales Audit Office published June 2019

Improvement Proposals arising from the report -

To improve awareness of the front door we recommend that:

- · local authorities:
  - -- review their current approaches, consider their audience, and ensure that goodquality information is made available in a timely manner to avoid needs deteriorating and people presenting for assistance in 'crisis';
  - -- work in partnership with public and third-sector partners to help ensure people accessing via partner referrals, or other avenues, are given the best information to help them;

- -- ensure that advocacy services are commissioned and proactively offered to those who need them at first point of contact; and
- -- to take local ownership and lead on the co-ordination and editing of local information published on Dewis Cymru locally.

#### 2. We recommend that:

- local authorities:
- -- map the availability of preventative services in their area to better understand current levels of provision and identify gaps and duplication;
- -- involve third-sector partners in co-producing preventative solutions to meet people's needs and ensure people have equitable access to these services;
- -- work with third-sector partners to tailor and commission new services where gaps are identified; and
- -- work with partners to improve data to evaluate the impact of preventative services on individuals and the population more generally.

### Progress against improvement proposals

The Adults, Health and Well-being Department has received this report and will assess its content in more detail jointly with the Cabinet Member, to see how these recommendations are relevant to the work of Gwynedd Council as we provide a service to our residents.

#### Conclusion

Based on what is noted above, the Audit and Governance Committee is asked to agree that all the improvement proposals above be noted as "being planned".

 Review of Public Services Board - National Report by the Wales Audit Office published October 2019

Improvement Proposals arising from the report -

We recommend that PSBs:

• conduct formal assessments to identify the potential impact on people with protected characteristics and the Welsh language and review agreed actions to ensure any adverse impacts are addressed;

- improve transparency and accountability by making PSB meetings, agendas, papers and minutes accessible and available to the public;
- strengthen involvement by working to the guidance in the National Principles for Public Engagement in Wales; and
- feedback the outcome of involvement activity identifying where changes are made as a result of the input of citizens and stakeholders.

To improve scrutiny, we recommend that:

- PSBs and public bodies use the findings of the Auditor General for Wales' Discussion Paper: Six themes to help make scrutiny 'Fit for the Future' to review their current performance and identify where they need to strengthen oversight arrangements and activity; and
- PSBs ensure scrutiny committees have adequate engagement with a wider range of relevant stakeholders who can help hold PSBs to account.

To help build capacity, consistency and resourcing of activity we recommend that:

- PSBs take the opportunity to discharge other plan and strategy obligations through the Local Wellbeing Plan;
- the Welsh Government enables PSBs to develop flexible models of working including:
- merging, reducing and integrating their work with other forums such as Regional Partnership Boards; and
- giving PSBs flexibility to receive, manage and spend grant monies subject to PSBs ensuring they have adequate safeguards and appropriate systems in place for management of funding; effective budget and grant programme controls; and public reporting, scrutiny and oversight systems to manage expenditure.

#### Progress against improvement proposals

It is early days, but as a Council, and a member of the Public Services Board, we will contribute to the discussion with our partners on how to respond to the above recommendations.

#### Conclusion

Based on what is noted above, the Audit and Governance Committee is asked to agree that all the improvement proposals above be noted as "being planned".