



WALES AUDIT OFFICE
SWYDDFA ARCHWILIO CYMRU

Corporate Assessment Report 2015

Carmarthenshire County Council

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The Auditor General and staff of the Wales Audit Office aim to provide public-focused and proportionate reporting on the stewardship of public resources and in the process provide insight and promote improvement.

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Summary report

- 1 In 2013-14, staff of the Wales Audit Office began a four-year cycle of corporate assessments of improvement authorities in Wales. This means that, in addition to an annual programme of improvement studies and audits of councils' approaches to improvement planning and reporting, each authority will receive an in-depth corporate assessment once during a four-year period. In the intervening years, we will keep track of developments through progress updates.
- 2 Our fieldwork for the corporate assessment focused on the extent to which arrangements are contributing to delivering improved service performance and outcomes for citizens. The corporate assessment sought to answer the following question: 'Is the Council capable of delivering its priorities and improved outcomes for citizens?'
- 3 The Auditor General has concluded that: Carmarthenshire County Council, demonstrating ambition in its vision, with collective leadership and more robust and transparent governance, is delivering improved outcomes for its citizens although some out-dated approaches may limit the speed of progress. He came to this conclusion because:
 - a increasingly collective leadership is supporting a revised vision for Carmarthenshire and sustaining a culture of improvement;
 - b the Council has made good progress in establishing improved governance arrangements which are now more robust and transparent, although there are opportunities for further improvements to enable Members to be more effective in their roles;
 - c the Council's arrangements for managing its resources have served it well in the past, but the current approach in some areas is out-dated and not joined up, which may limit the speed of progress towards improved outcomes for citizens:
 - the Council's ability to respond to future financial challenges could be hampered as service and financial planning and performance are not clearly linked, individual savings are not routinely monitored and weaknesses in grants management continue to be a concern;
 - the Council's approach to people management is working well and it is addressing some of the key areas that need strengthening, such as strategic workforce planning;
 - the Council's ability to effectively manage its asset base is currently being hampered by a number of factors; and
 - whilst slow to respond to the significant shortcomings with its ICT arrangements the Council is now taking action to improve.
 - d the Council has an established and effective approach to partnership working;

- e the Council's framework to manage improvement is good but lacks quality and consistent application within some departments leading to a lack of accountability; and
- f the Council, in collaboration with partners, is continuing to improve performance across its priority areas.

Proposals for Improvement

Proposals for Improvement	
P1	<p>Governance:</p> <ul style="list-style-type: none"> • Develop forward work programmes to ensure that all appropriate committees have a published up to date programme owned by committee Members. • Publish a register of delegated decisions. • Develop and deliver training to help Members understand their roles and responsibilities and refresh this training delivery as Members move between roles. • Review the remit of Audit Committee to make sure it is delivering what is expected of it.
P2	<p>Use of Resources – Finance:</p> <ul style="list-style-type: none"> • Develop more explicit links between the medium term financial plan (MTFP) and the Council's improvement planning, detailing the impact that financial constraints are having on outcomes for citizens. • Develop and utilise benchmarking and Value for Money Indicators in budget setting to better inform decisions and allow for further debate and challenge of existing costs and potentially identify further efficiency savings. • Improve financial reporting by: <ul style="list-style-type: none"> – developing clearer links between financial and service performance including developing joint financial and performance reports to Members; – monitoring and reporting on individual savings targets to ensure that areas of over and underachievement are explicitly identified enabling effective challenge, remedial action and sharing of good practice; – providing sufficient information on reserves and a clear audit trail for decisions regarding reserves; and – liaising with Members to ensure that financial information is appropriate to their needs. • Strengthen procurement arrangements by: <ul style="list-style-type: none"> – reviewing the reasons for non-compliance with procedures and taking corrective action to prevent these re-occurring; – setting up and maintaining a Tender Register and Contracts Register; – establishing, maintaining and regularly reporting to Audit Committee a list of single tender actions; and – reviewing the differences in the use of the Council's framework contracts to drive a more consistent process going forward.

Proposals for Improvement

P3 Use of Resources – People:

- Finalise and implement the revised structure for People Management and Performance (PMP) Division.
- Ensure all staff have an annual individual performance appraisal.
- Simplify communication mechanisms both within PMP and those used for communicating people management initiatives to the wider workforce.
- Review the ICT systems and equipment used within PMP and drive developments to deliver as a minimum:
 - a single personnel record;
 - effective self-service;
 - agile working for PMP officers;
 - a clear business requirement for ICT communicated to the ICT Strategy Group; and
 - more effective use of the Insight reporting system.

P4 Use of Resources – Assets:

- Strengthen the service level asset management plans and improve links between these plans and the overarching corporate asset management plan.
- Report progress against the corporate asset management plan and the office accommodation strategy to Members quarterly.

P5 Use of Resources – ICT and Information Management:

- Ensure that the ICT work streams resolve the apparent disconnect between the business and the ICT service and take appropriate account of business needs.

P6 Improvement Planning:

- provide clearer direction and professional level challenge on all performance management issues to ensure consistent application of the Council's performance management framework and sharing of good practice.

Introduction

- 4 In 2013-14, staff of the Wales Audit Office began a four-year cycle of Corporate Assessments of improvement authorities in Wales. This means that, in addition to an annual programme of improvement studies and audits of councils' approaches to improvement planning and reporting, each Council will receive an in-depth Corporate Assessment once during a four-year period. In the intervening years, we will keep track of developments and focus further assessment work on a number of key themes, developed in discussion with each Council.
- 5 We undertook our Corporate Assessment fieldwork in Carmarthenshire County Council (the Council) during October 2015. Whilst the Corporate Assessment does not aim to provide a comprehensive analysis of the performance of all of the Council's services, it reports on the Council's track record of performance and outcomes as well as the key arrangements that are necessary to underpin improvements in services and functions.
- 6 This work has been undertaken by staff of the Wales Audit Office on behalf of the Auditor General. With help from Welsh inspectorates, Estyn (for education), the Care and Social Services Inspectorate for Wales (CSSIW), and the Welsh Language Commissioner, we have brought together a picture of what the Council is trying to achieve, how it is going about it, and the progress it has made.
- 7 This conclusion should not be seen as a definitive statement of organisational health or as a prediction of future success. Rather, it should be viewed as providing an opinion on the extent to which the arrangements currently in place are reasonably sound insofar as can be ascertained from the work carried out.
- 8 Our fieldwork for the Corporate Assessment focused on the extent to which arrangements are contributing to delivering improved service performance and outcomes for citizens. The corporate assessment sought to answer the following question: 'Is the Council capable of delivering its priorities and improved outcomes for citizens?'
- 9 The Corporate Assessment covers the following:
 - Vision and strategic direction:
 - 'Does the Council's vision and strategic direction support improvement?'
 - Governance and accountability:
 - 'Do the Council's governance and accountability arrangements support robust and effective decision-making?'
 - Use of resources:
 - 'Is the Council managing its resources effectively to deliver its planned improvements in performance and outcomes?'
 - Collaboration and partnerships:
 - 'Are the Council's collaboration and partnership arrangements working effectively to deliver improved performance and outcomes?'

Managing improvement:

- 'Is the Council effectively managing its improvement programme?'

Performance and outcomes:

- 'Is the Council making progress on achieving its planned improvements in performance and outcomes?'

- 10 The conclusions in this report are based on the work carried out and, unless stated otherwise, reflect the situation at the point in time they were concluded.
- 11 Given the wide range of services provided and the challenges facing the Council, it would be unusual if we did not find things that can be improved. The Auditor General is able to:
- a Make proposals for improvement – we make such proposals in this report and we will follow up what happens.
 - b Make formal recommendations for improvement – if a formal recommendation is made the Council must prepare a response to that recommendation within 30 working days. We find no reason to make such recommendations.
 - c Conduct a special inspection and publish a report and make recommendations. We find no reason to conduct such an inspection.
 - d Recommend to Ministers of the Welsh Government that they intervene in some way. We find no reason to make such a recommendation.
- 12 We want to find out if this report gives you the information you need and whether it is easy to understand. You can let us know your views by e-mailing us at info@audit.wales or writing to us at 24 Cathedral Road, Cardiff, CF11 9LJ.

Detailed report

Carmarthenshire County Council, demonstrating ambition in its vision, with collective leadership and more robust and transparent governance, is delivering improved outcomes for its citizens although some out-dated approaches may limit the speed of progress



Increasingly collective leadership is supporting a revised vision for Carmarthenshire and sustaining a culture of improvement

The Council has recently launched a revised vision that places regeneration at the heart of everything it does

- 13 The Council has a good understanding of the local context in which it operates, informed by a Joint Strategic Needs Assessment and a good track record of effective community and stakeholder engagement. This includes the Citizens Panel, national and local customer satisfaction surveys, 50+ Forum surveys, tenant engagement and budget consultation road shows.
- 14 Over the last four years, a clearly articulated and well established vision including high level objectives has guided the Council's improvement activity. These objectives, taken from the Local Service Board's (LSB) Integrated Community Strategy (ICS) are:
 - a people in Carmarthenshire are healthier;
 - b people in Carmarthenshire fulfil their learning potential;
 - c people who live, work and visit Carmarthenshire are safe and feel safer;
 - d Carmarthenshire's communities and environment are sustainable; and
 - e Carmarthenshire has a stronger and more prosperous economy.

Further to this the Council has published a set of core values to guide how it conducts its business which the Council added to in 2014 by setting the ambition to be the 'most open and transparent Council in Wales'.

- 15 On 9 October 2015 the Council launched its revised vision, placing regeneration at the heart of everything it does. This revised vision builds firmly on a successful track record and outlines a set of six new regeneration projects across the county. By building on the past the revised vision fits well with existing high level objectives and existing partnerships particularly those of the LSB and the Swansea Bay City Region.
- 16 Both Executive Board Members and senior officers demonstrate a clear and thorough understanding of the revised vision. The Council's next steps are to engage the wider staff base so they understand how they contribute to the overall ambition.

- 17 In addition to the vision building on the Council's previous aims, there is clear involvement and alignment with the work of the Swansea Bay City Region and the University of Wales Trinity Saint David's Group. The Council and the University of Wales Trinity Saint David's Group have signed a pledge to work together. The pledge reflects a number of areas that are shared priorities:
- a sustainable development;
 - b anti-poverty, economic and community development;
 - c skills and labour market;
 - d enterprise and innovation; and
 - e sport culture, tourism and heritage.
- 18 Both the Council and the University of Wales Trinity Saint David's Group are LSB members, and since our review the Council has formally communicated the vision to the LSB.

Increasingly collective leadership is driving a culture of continuous improvement

- 19 The Council's current administration was formed in May 2015 and is providing strong and coherent leadership and direction. The Executive Board has a strong 'team' ethos and new Executive Board Members are being mentored and supported by those with more experience.
- 20 Despite elections in two years' time the new administration has adopted a longer-term, five-year work programme, setting a realistic timescale to drive sustainable change and improvement.
- 21 The Corporate Management Team (CMT) has been subject to considerable change. In the last 12 months, four directors have retired and a further CMT member moved to another Council: only three existing CMT members remain. The Council has taken the opportunity to reduce the number of directors and to adjust their remits but has taken time to recruit the 'right people into the right roles'. The changes have brought a new enthusiasm and energy to CMT.
- 22 The revised directorate remits are driving a positive reduction in internal silos, bringing services together. A good example is the Communities Directorate, which now includes Primary, Community and Social Care, Mental Health and Learning Disabilities, Public Protection and Housing, and Leisure and Sport. Co-locating heads of service is also bringing additional benefits and highlights the impact that changes in one part of the directorate have on the others.

- 23 The new Executive Board and the refreshed CMT work well together, relationships between Members and officers are constructive and Executive Board Members challenge officers well within a 'no blame' culture. Executive Board is clearly the owner of the Council's revised vision, and Executive Board Members are actively involved in setting priorities, business planning and identifying areas for cost reduction. They are supported in this role with a range of information either in paper form or through Member seminars.
- 24 This increasingly collective leadership linked to the current budget pressures is contributing to a developing culture of change and innovation across the Council that is strengthening the focus on improvement with a willingness to explore alternative methods of service delivery.

The Council has made good progress in establishing improved governance arrangements which are now more robust and transparent, although there are opportunities for further improvements to enable Members to be more effective in their roles

The Council is improving the transparency of its governance arrangements

- 25 The Council has a key improvement objective for 2015-16 to 'review governance, decision making, openness and transparency' and the Council has the very positive ambition to become the 'most open and transparent Council in Wales'. To support the delivery of this improvement objective the Council commissioned the Welsh Local Government Association (WLGA) to undertake a peer review.
- 26 Following this, the Council has made a number of changes to its governance arrangements including:
- a webcasting of Council, Executive Board and Planning Committee meetings;
 - b introducing a standing item on Council, Executive Board and Scrutiny Committee meetings for public and councillor questions; and
 - c revising its call-in procedure to enable any three Members of the Council to call in a decision of the Executive.
- 27 General relationships between officers and Members and between Members are improving and there is a constructive working relationship between the Executive Board and the CMT. Executive Members are also assuming greater ownership of their portfolios, for example, there is now an expectation that they will present reports at Executive Board meetings, and they have been involved in challenging service area business plans within their portfolios. As Executive Board Members gain experience they are becoming clearer on how the priorities for individual portfolio holders link to the Council's corporate priorities.
- 28 Whilst the Council has made progress, there remains scope to further enhance the transparency of some aspects of the Council's arrangements. For example, the Council does not publish records of decisions delegated to individual officers, and both the Audit Committee and the Democratic Services Committee are yet to develop forward work programmes. Whilst the Council's overview and scrutiny forward work programmes are published on the Council's website, when we examined these we found that they had not recently been updated and were still marked as 'draft'.

The Council is strengthening its approach to Member training and development but further improvements are needed to support Members to be effective in their specific roles within the Council's governance arrangements

- 29 The Council adopted a Member Development Strategy in 2013 and has provided a range of training for elected Members, and training for Members who sit on the Planning and Licensing Committee is mandatory. The Council has also nominated an Executive Board Member to champion elected Member training and development. However, we heard mixed views on the effectiveness and availability of training for elected Members to date. Some Members were content that training is provided when asked for, but others believed that additional training, particularly in relation to specific roles that Members undertook within the Council, would be beneficial.
- 30 An example of the lack of clarity of roles amongst some Members is the role of Executive Board Members in the scrutiny process. The Constitution sets out the role/expectations of Executive Board Members and senior officers when attending scrutiny committee meetings and it has been agreed that Executive Board Members will attend scrutiny committee meetings to present reports and answer questions. Despite this, in practice we found that there is still some confusion amongst elected Members regarding the role of Executive Board Members at scrutiny committee meetings and that to date questions at scrutiny committee meetings have largely been directed at officers rather than Executive Board Members. Executive Board Members are not taking the initiative and stepping in to the debate.
- 31 The Council's Constitution also sets out clear arrangements for Executive Board Members to respond to the recommendations received from scrutiny committees, including a requirement to set out the reasons why a recommendation has been rejected. However, we heard some concerns that in practice reasons are not always provided when recommendations are rejected.
- 32 There are examples of effective scrutiny including the work of task and finish groups, for example, a review of empty homes that resulted in a number of recommendations to the Executive Board. Although not all of the Council's scrutiny committees established a task and finish group during 2014-15.

- 33 At times there is a lack of clarity regarding the purpose of some items that are considered by scrutiny committees with a number of reports being ‘accepted’ with no clear outcome from discussions. The lack of clarity regarding the purpose of scrutiny items and the interaction between the Executive Board Members and scrutiny committees has the potential to weaken the ability of scrutiny committees to effectively hold the Executive to account. This presents an opportunity for scrutiny chairs/Members to take greater ownership of the agenda and the content and focus of forward work programmes.
- 34 The Council has put in place opportunities for the public to engage with scrutiny committees, as the public are able to request items to be placed on scrutiny committee agendas, as well as asking questions at meetings of scrutiny committees. However, there was also recognition amongst some Members that public engagement in the scrutiny process is an area that could be improved.
- 35 There are opportunities to strengthen the operation of the Council’s Audit Committee and ensure that it delivers its remit¹ for example, by ensuring that the Committee receives copies of all regulatory reports, its consideration of financial reports, risk and fraud and improving the level of information shared with the committee in relation to the Council’s risk register and restricted items.

Proposal for Improvement

P1 Governance:

- Develop forward work programmes to ensure that all appropriate committees have a published up to date programme owned by committee Members.
- Publish a register of delegated decisions.
- Develop and deliver training to help Members understand their roles and responsibilities and refresh this training delivery as Members move between roles.
- Review the remit of Audit Committee to make sure it is delivering what is expected of it.

¹ CIPFA Audit Committees: Practical guide for Local Authorities and Police 2013

The Council's arrangements for managing its resources have served it well in the past, but the current approach in some areas is out-dated and not joined up, which may limit the speed of progress towards improved outcomes for citizens

The Council's ability to respond to future financial challenges could be hampered as service and financial planning and performance are not clearly linked, individual savings are not routinely monitored and weaknesses in grants management continue to be a concern

- 36 The Council undertakes extensive consultation on the budget savings proposals and comprehensive and reasonable planning assumptions have been made in identifying the Council's budget shortfall for 2015-16. In addition, the Council has used a range of scenarios and sensitivity analysis to model projections for budget shortfalls for the period 2016-17 to 2018-19. However, the Council undertakes only limited service specific benchmarking/value-for-money comparisons as part of the budget-setting process, development of its efficiency savings and more widely in terms of the Council's costs and income. This limits debate on areas that might be high cost/low charge compared to others. The Council has stated that it is updating its approach by developing this as part of the 2016-17 budget-setting process.
- 37 The Council has a good track record in delivering annual budgets against the planned actions it approved. The Council's financial management and control arrangements are fit for purpose and are being effectively managed. In particular, budget setting is robust and timely with good Member engagement. However, there are not explicit links between service and financial plans and the service planning and budget-setting processes are not fully aligned. The Council recognises that with the level of savings required over the next few years it is important that it updates its approach by ensuring that there are explicit links between business and financial plans. The Council is also seeking to align the business and budget-setting process for 2016-17.
- 38 The Council monitors its budgets on a bi-monthly basis with reports to Executive Board and CMT prior to the relevant scrutiny committees. The reports provide sufficient accurate financial information and commentary to allow for effective challenge on variations in expenditure to approved budget, but progress on achieving budget savings lacks transparency as the achievement of budget savings and associated risks is not reported on an individual basis. In addition, some Members commented that budget information is too complex and that more support is needed to ensure that they sufficiently understand the financial information in order to make effective decisions.
- 39 No performance indicators are reported as part of budget monitoring and performance reports are not taken alongside financial budget monitoring reports to enable 'whole service' analysis. The links between financial information and performance information are therefore not clearly made, for example, the impact of service performance on financial performance and vice versa.

- 40 The Council is in a strong position in respect of 'usable' reserves and has increased these in recent years to stand at some £123 million at the end of 2014-15. The Council does not have a reserves policy but does have a policy to maintain the Council Fund balance within three per cent of its net revenue expenditure which it is maintaining. Reserves are reviewed annually when setting the Council's annual budget. However, some Members commented on there not being enough information on reserves and the decisions to use reserves, although since our review some Members have received a presentation on reserves from members of CMT.
- 41 The Council does not have a formal policy for income generation/charging other than a policy that all fees and charges will increase annually by inflation as a minimum unless there is a business case otherwise. The Council is reviewing its policy in this area and we recommended in our 2014-15 Financial Assessment Report that this work should be finalised to ensure that it remains relevant and feeds into the decisions being made to address funding pressures over the next few years. However, the review of income generation/charging has still not been completed.

Weaknesses in grants management continue to be a concern

- 42 The Council manages a large number of schemes/projects for which it has been successful in obtaining grant funding. In 2013-14, the amount of grant funding received was over £350 million covering approximately 170 schemes. It is therefore important that the Council has robust systems and controls for grants management, including a proactive Audit Committee holding officers to account, to ensure that the monies are properly and efficiently spent and comply with relevant grant conditions. Failure to do so could result in loss of grant funding or reclaim by the grant providers, challenge from external parties and the associated bad publicity.
- 43 For a number of years, we have reported as part of our financial audit work, weaknesses within the Council's grants management processes. Internal Audit (IA) has also reported similar issues regarding grants management from its programme of work. The Council has started to resolve these weaknesses but as a matter of priority it needs to address those remaining.

Procurement arrangements are not always followed

- 44 In recent years we have reported on a number of weaknesses in procurement. Some of these are linked to the grants management issues noted above, but weaknesses in procurement are not isolated to grants alone. From this work, we found the following issues:
- a non-compliance with procurement rules including single tender actions and the need for retrospective approvals in some cases;

- b there is no list of single tender actions and retrospective approvals maintained or reported to Audit Committee;
- c contrary to good practice there is no Tender Register to record the outcomes of tenders ie, who submitted and who was successful, in addition there is no summary making it difficult to analyse trends and success rates;
- d there is no complete Contracts Register to record contracts that the Council holds and details of these, for example, nature, length of contract, expiry date etc; and
- e there are differences in the arrangements for utilising the Council's framework contracts with some using mini frameworks, some call-offs, etc, which need to be clarified.

Proposal for Improvement

P2 Use of Resources – Finance:

- Develop more explicit links between the medium term financial plan (MTFP) and the Council's improvement planning, detailing the impact that financial constraints are having on outcomes for citizens.
- Develop and utilise benchmarking and Value for Money Indicators in budget setting to better inform decisions and allow for further debate and challenge of existing costs and potentially identify further efficiency savings.
- Improve financial reporting by:
 - developing clearer links between financial and service performance including developing joint financial and performance reports to Members;
 - monitoring and reporting on individual savings targets to ensure that areas of over and underachievement are explicitly identified enabling effective challenge, remedial action and sharing of good practice;
 - providing sufficient information on reserves and a clear audit trail for decisions regarding reserves; and
 - liaising with Members to ensure that financial information is appropriate to their needs.
- Strengthen procurement arrangements by:
 - reviewing the reasons for non-compliance with procedures and taking corrective action to prevent these re-occurring;
 - setting up and maintaining a Tender Register and Contracts Register;
 - establishing, maintaining and regularly reporting to Audit Committee a list of single tender actions; and
 - reviewing the differences in the use of the Council's framework contracts to drive a more consistent process going forward.

The Council's approach to people management is working well and it is addressing some of the key areas that need strengthening, such as strategic workforce planning

The Council's People Strategy Group has developed a clear People Strategy, however, this is not embedded effectively and the People Management and Performance division's business plan is weak

- 45 The Council's People Strategy Group (PSG) is effective and has been responsible for the development of the Council's new People Strategy which clearly sets out two visions. The first outlines how the Council wants to manage and treat people and the second captures the Council's ambition about how it hopes the workforce will feel as a result. However, the strategy is not yet embedded within the culture of the organisation as many officers could not explain the overall vision clearly.
- 46 Alongside the strategy the Council has developed a range of indicators it will use to assess whether it is making progress towards the People Strategy goals. However, a number of the measures are too vague, making it difficult to assess both the Council's ambition and its progress.
- 47 The People Management and Performance (PMP) business plan is confusing and difficult to read making it hard to understand how the division's five business units are going to work together, or individually, to achieve the strategic goals. Like the measures supporting the strategy the actions included in the plan are not specific, measureable or time bound making it difficult for managers to be held to account. However the Council is working on creating a suite of metrics that can be used to measure future performance better.
- 48 Possibly as a consequence of the weakness of the PMP business plan the Learning and Development (L&D) and Fitness for Work (F4W) business units within the PMP Division have written their own strategies and action plans, however, these further confuse the situation.

The Council is successfully implementing initiatives in a number of areas to increase people capability and to achieve the Council's People Strategy goals

- 49 The Council has a broad range of good-quality, well-written accessible people management policies in place. These are supported by clear manager guides.
- 50 The Council has achieved significant success in improving its sickness absence performance. This is the result of a joined-up approach between PMP and the Policy and Resources (P&R) scrutiny committee. The P&R committee established a Task and Finish group, a key recommendation of which was to set up a dedicated Attendance Team. This team together with robust and effective support from F4W has helped improve sickness levels from 11.3 to 9.6 days per Full Time Equivalent (FTE) over the last two years.

- 51 The L&D business unit has completed a great deal of effective work to develop the Council's workforce with a range of talent management and development programmes. However, the Council may be missing an opportunity by not using the Trade Unions Learn facility.
- 52 Linked to this the Council has reviewed its recruitment process for senior appointments, by introducing a rigorous process where candidates are assessed against the newly created leadership competency framework.
- 53 An established appraisal process is in place and to encourage take-up the Council promotes basing the appraisal process on high quality, regular conversations between line managers and their team members. However, not all staff have appraisals and some managers still operate a model of collective appraisal which is not good practice.
- 54 Attendance at Departmental Management Team (DMT) meetings by each business unit demonstrates the PMP Division's commitment and support for departments as well as adding value through expertise, performance information and challenge.
- 55 The co-location of the PMP Division is bringing benefits including the stronger feeling of 'team' and increased communication and interaction between PMP members. Payroll has also been co-located but remains managed by the finance service. The PMP Division has been planning a restructure for at least two years. The restructure plans include the introduction of a single point of contact for HR Payroll Support queries via a Helpdesk. Currently, it is unclear when the restructure will be completed and this uncertainty, particularly for those on temporary contracts, is a cause of frustration for officers, and is a critical factor in ensuring the efficiency and effectiveness of the service moving forward.

The Council recognising the need to strengthen workforce planning has developed a toolkit to gather consistent workforce information

- 56 The Council recognised that it has not been strong at workforce planning for some time and has included a workforce planning risk in the Corporate Risk Register, in part due to successive rounds of severance processes. As a result the PMP Division has developed a Workforce Planning Toolkit for Managers. Now with an annual process linked to the development of the 2016-2017 business plans, the service workforce plans will be collated onto a corporate workforce plan by July 2016.
- 57 The Council has run three severance schemes and is currently on its fourth. This fourth scheme is based on a three-year plan rather than a single year; therefore it fits better with longer-term workforce planning.

The Council has a number of information systems to support the PMP Division; however, the Council is not maximising their value and splitting employee information between systems could pose a risk to the Council.

- 58 The Northgate Resource Link HR Payroll system has been in place for 11 years and has been updated regularly to ensure legal compliance and improve functionality. However, the system has not been developed as effectively as it could have been. For example, it is not used for the appraisal process, recording continuing professional development, or talent management. As a result the Council is spending more time undertaking these tasks manually.
- 59 There is a limited use among directors, heads of service and HR staff of the Insight reporting system. HR officers have been asked to supply specifications for reports but they have not engaged with this process compounding the generally stated perception that reporting from HR information systems is difficult.
- 60 The Northgate Information@Work document management system is also used to hold certain personnel-based information for employees. The records in Information@Work supplement the information held within Resource Link resulting in personnel information being included in two electronic systems which are not integrated. We understand that there are also paper case files, further weakening PMP's out-dated record keeping approach, which collectively poses a risk to the Council.

Communication within PMP and with the wider Council is complex and not always effective

- 61 Although there are meetings for each sub-team, the PMP division does not meet as a whole. Meeting as a group would help with the communication of strategic level messages as currently it is evident from officers' knowledge that this feedback is weaker than that for operational feedback.
- 62 The Communications manager works closely with the PMP division to facilitate communication and engagement with staff across the whole Council. However, whilst it is clear that the Council places high importance on managing people well to produce an engaged and well-informed workforce it overloads them with too many messages through too many different routes. This has the potential that key messages may get lost and the workforce may become blind to people management initiatives and changes.

Proposal for Improvement

P3 Use of Resources – People:

- Finalise and implement the revised structure for People Management and Performance (PMP) Division.
- Ensure all staff have an annual individual performance appraisal.
- Simplify communication mechanisms both within PMP and those used for communicating people management initiatives to the wider workforce.
- Review the ICT systems and equipment used within PMP and drive developments to deliver as a minimum:
 - a single personnel record;
 - effective self-service;
 - agile working for PMP officers;
 - a clear business requirement for ICT communicated to the ICT Strategy Group; and
 - more effective use of the Insight reporting system.

The Council's ability to effectively manage its asset base is currently being hampered by a number of factors

- 63 The Council has a Corporate Asset Management Plan (CAMP) which covers the period 2013-2016. This plan is currently being reviewed to cover 2016-2019 prior to wider consultation. Service Asset Management Plans (SAMPs) help inform the CAMP but these are of variable quality and the links between the SAMPs and the CAMP are weak. Small updates are made to the CAMP yearly but these are not clearly reported to Members.
- 64 The Council holds only limited information in relation to building condition. The conditions survey data gives a general categorisation of the condition of the asset (with an A – D rating) but it does not give an estimate of the cost of bringing the properties up to a satisfactory standard. This hampers effective decision making.
- 65 Recognising the need to reduce the amount of office accommodation that it uses, the Council has developed an Office Accommodation Strategy for 2014-17. The strategy aims to reduce leased accommodation and any secondary offices, leaving the Council with a smaller portfolio of good-condition, fit-for-purpose properties. The Council has achieved a reduction in the amount of floor area of office accommodation between 2012-2013 and 2014-15 of over 11 per cent (34,462 m² to 30,522 m², with further reductions being delivered in the current year. The Council reports that reducing office space has saved approximately £225,000 in revenue costs and led to capital receipts of nearly £450,000. The rationalisation approach is also bringing additional benefit in co-locating staff, helping create efficiencies in how people are working.

- 66 The Council has an Agile Working Policy (published July 2010) which recognises that working in this way can help reduce the Council's office accommodation needs. Whilst ICT infrastructures have not been able to effectively support this more modern way of working, a project is currently underway to implement a Virtual Desktop Infrastructure. A successful pilot has already been undertaken with the Youth Offending Team based in Llanelli.
- 67 Despite a weak property market which has delayed sales, last year the Council was able to significantly exceed its financial target for the disposal of assets achieving £6.7 million in non-housing capital receipts during 2014-15 (against a target of £2.28 million). This resulted from the sale of land at the Cross Hands West Development. In order to better plan for the future the Council has produced a five-year capital receipt strategy.
- 68 Collaborative working on assets with other public-sector partners is seen by the Council as an area where further improvements can be made. The LSB is looking at where partners can share property strategies and facilitate the identification of property collaboration opportunities. Already benefits include opportunities for sharing of buildings. However, not all partners regularly attend these meetings, limiting their effectiveness.
- 69 The Council is also actively pursuing a policy of Community Asset Transfer. To support this process the Council has established an Asset Transfer Team which has representatives from different service areas and is focused on supporting community groups through the asset transfer process. The closing date for expressions of interest in relation to sporting assets closes in March 2016 and there is positive interest from Community and Town Councils and sports clubs. There are already a number of successful asset transfers that have taken place but the Council has some way to go to meet the savings targets identified in its budget strategy.
- 70 Other assets such as the Council's vehicle fleet are also receiving attention. The fleet project has seen a reduction in total vehicle numbers and a rationalisation of refuse collection rounds. These initiatives have led to savings of around £750,000.

Proposal for Improvement

P4 Use of Resources – Assets:

- Strengthen the service level asset management plans and improve links between these plans and the overarching corporate asset management plan.
- Report progress against the corporate asset management plan and the office accommodation strategy to Members quarterly.

Whilst slow to respond to the significant shortcomings with its ICT arrangements the Council is now taking action to improve

- 71 In December 2014, the Chief Executive, recognising a number of significant shortcomings within the Council's ICT service sought a review into the way the Council's ICT was delivered. This initial high-level review was undertaken by the Head of IT and Central Support Services from Pembrokeshire County Council and resulted in the formation of a strategic and operational partnership between the two organisations. The joint Head of ICT is now responsible for producing a business case that supports, or otherwise, the case for a single ICT service. Recognising the importance of the ICT function, the Council's new arrangements rightly see the joint Head of ICT reporting directly to the Chief Executive.
- 72 To inform the business case the Joint Head of ICT has established four work streams, these are:
- a server infrastructure and disaster recovery arrangements;
 - b voice and data networks;
 - c access to services – to include desktop and mobile/agile working platforms;
and
 - d applications.
- 73 The work streams are operating on a task and finish basis with the instruction to look at:
- a cost by council of the current delivery model;
 - b cost of each of the current service delivery models deployed across both councils; and
 - c cost of a revised/redesigned delivery model for both councils.
- The outcomes from the work streams will not only inform the business case but also a revised digital strategy.
- 74 As the work streams have only just started their work it is too early to evaluate progress. However, it is critical that the Council makes progress over the next 12 months, in particular it must rebuild the organisational trust in ICT and create a modern ICT service that can both operate in an effective and efficient way and help facilitate change for citizen-focused services, enabling the Council to deliver quality outcomes with less resource. We will continue to monitor progress, the outcomes of the work streams and the development of the business case.

The Council's information management arrangements have served it well, but it faces new challenges as it moves towards a more mobile and agile workforce

- 75 The Council commissioned the National Archives to provide training for Information Asset Owners. This training was delivered in June 2015 and was attended by over 50 staff. Two further sessions are planned. The Senior Information and Risk Owner (SIRO) has also attended training along with other Members of the corporate team. The course provided officers with a clear picture of the responsibilities of the SIRO. The Council also has an e-learning module available, which is used by staff to refresh their knowledge.
- 76 The Council has a set of agreed information governance priorities which are in line with the Data Protection Act. Governance arrangements themselves are delivered through the Corporate Information Governance Group which was established in 2012 and is chaired by the SIRO. The Council processes a wide range of personal and financial information and has appropriate controls in place to provide security assurance.
- 77 The Council has experienced an increase of 25 per cent in the number of Freedom of Information Act requests since 2012. The Council has maintained its performance in responding to requests.
- 78 The corporate file plan continues to develop, with improvements being made in the controls that are applied to manage access. New service-based administrators, with detailed knowledge of their services and staff now apply the controls restricting access to only those who need it. The local service administrators are also enabled to manage the structure of the file plan in their area, below the first two layers, which follow the nationally recommended model. Other initiatives include email management and an increased use of the electronic document management system Northgate Information@Work. As the Council moves to a more mobile and agile workforce, it will face the challenge of ensuring that the information officers require is available to them wherever they are working, in a secure and safe way. As a result it needs to consider if its current file plan can meet its future business needs.
- 79 The Council plans to further improve governance arrangements. In particular the Council recognises the need to improve information risk management, further increase security controls, respond to the new European Union General Data Protection Regulation and continue to manage effectively its information sharing protocols.

Proposal for Improvement

- P5 Use of Resources – ICT and Information Management:
- Ensure that the ICT work streams resolve the apparent disconnect between the business and the ICT service and take appropriate account of business needs.

The Council has a well-established and effective approach to partnership working

- 80 The Council has a long, well-established and robust approach to partnership working that is improving outcomes for its citizens. The partnership with Hywel Dda University Health Board (HDUHB) is particularly strong, collaboration has become 'mainstreamed' into the working relationship between the two organisations with a number of joint posts in place.
- 81 The Council has identified a number of areas to strengthen or simplify joint working with HDUHB to make it more straightforward. For example, the two organisations have different people management policies and have a very different approach to measuring service performance. Both the Council and the HDUHB are working on more complex aspects of partnership working such as shared strategies, a joint commissioning hub and pooled budgets, which they both acknowledge as being critical to drive further integration, efficiencies and better outcomes for citizens.

The Carmarthenshire Local Service Board has been an effective enabler

- 82 The Carmarthenshire Local Service Board (LSB) has clear aims set out in its Single Integrated Plan (SIP). The LSB has effectively used work streams (task and finish groups) to look at collaborative opportunities across the public sector to lead to cost efficiencies and a better delivery of public services. There are a number of good examples which highlight the effectiveness of partnership working which have a focus on achieving outcomes, two examples are below:
- a A one-stop information Hub, in Llanelli provides face-to-face advice and information on a range of issues through the involvement of 18 different partner organisations. Services include signposting on education, training and employment, financial management and free digital access. Plans are in place to extend its use to other services such as homelessness and housing enquiries and to open further Hubs in Carmarthen and Ammanford.
 - b Partner organisations have built on the construction base in Carmarthenshire to create Constructing Carmarthenshire Together (CCT). The CCT is formed from three main partners, the Council, Coleg Sir Gar, and Carmarthenshire Construction Training Association Limited (CCTAL). Initially, partnership was started by CCTAL but the three organisations have worked together collaboratively to develop a capable skilled capacity for construction in the area. The partnership has opened pathways to employment and helped the construction industry to grow through the recession by taking students studying at Coleg Sir Gar on as apprentices supporting the improvement of the Council's housing stock.

- 83 There are, however, some examples where the same service is offered by more than one partner, particularly in the third sector. The Council recognises this and is currently mapping all third-sector involvement, grant awards and commissioning in order to identify key themes, link providers together and reduce duplication.
- 84 The LSB recognised that there were some areas where its arrangements were not effective enough. To help identify these it has commissioned an in-depth review of all strategic partnerships, current partnership arrangements and ways of working. This will help to ensure that the LSB remains fit for purpose and continues to add value to the work of the individual members. The timing of this review is particularly useful in terms of preparing the LSB for the transition to the Public Service Board (PSB) under the Well-being of Future Generations Act. One of the success factors identified has been the need for attendance at the LSB to be at the right level, those attending need to come with the right level of authority to make decisions and be able to commit (or not) their organisations to projects.
- 85 External communication from the LSB could be improved with a more effective use of social media and a greater focus on communicating the existence, purpose and achievements of the LSB to the citizens of Carmarthenshire.
- 86 The LSB has been proactively contacting neighbouring councils to work collaboratively. Initial approaches were not responded to productively, however, the Council has set up an LSB co-ordinators network with Pembrokeshire and Ceredigion County Councils to share learning and develop a shared framework for the upcoming Needs Assessment required by the Well-being of Future Generations Act.

The Council's framework to manage improvement is good but lacks quality and consistent application within some departments leading to a lack of accountability

Improvement planning is well managed but links with financial planning could be strengthened

- 87 A strong ethos of continuous improvement runs through everything the Council does. This focus on improvement is well supported by a clear framework of well-aligned plans and strategies that translate the high-level outcomes the Council has agreed with partners into priorities for action. These outcomes form the basis of all performance monitoring and reporting, with each outcome consistently colour coded for ease of reference in reports. Services map their contribution to these outcomes in business plans, raising staff awareness of their part in driving improvement.
- 88 The Council draws on information from a wide range of sources to determine how and where to direct its improvement efforts. This includes feedback from citizens, views of regulators, peer reviews, national policy and a broad range of performance information. This is supplemented by a maturing approach to self-evaluation that is becoming more robust, open and transparent.
- 89 The combined annual report and improvement plan (ARIP) provides a sound basis for improvement planning. It allows the Council to simultaneously review its past performance and plan what to do next within a single public document. The ARIP is very comprehensive, incorporating information from a wide range of sources that the Council uses to evaluate and challenge the progress it is making. This information is then used to determine what the Council needs to focus on going forward, including detailed actions and targets. Links with service business plans are explicit, although the links between financial planning and improvement planning are not as strong.
- 90 Political leadership of the improvement agenda has been strengthened. Executive Board Members are now taking greater responsibility for the performance of their portfolios, for example, by presenting their own reports, answering questions about performance, challenging business plans and attending scrutiny committees. The use of scrutiny Task and Finish groups is helping to drive improvement in a number of areas such as returning empty homes to use and tackling poverty.
- 91 Whilst head of service are held to account for performance adding a cross departmental review of performance would add to the level of challenge and enable the Council to better understand how the activity of one service impacts on the performance of others.
- 92 The Council demonstrates a determination to tackle major challenges to secure the improved outcomes it wants for local people, even in circumstances where its ability to exert influence is constrained by external factors largely outside its control; for example, by developing an ambitious strategy to increase the supply of affordable homes and taking decisive, co-ordinated action to more effectively tackle poverty.

93 The Council has a good track record of successfully managing its improvement programme and this is also apparent for the current year. Currently, 93 per cent of the 167 improvement actions in the ARIP that are scheduled to be completed during 2015-16 are on track, as are 72 per cent of performance measures. Looking more widely, 94 per cent of the deliverables in year 2 of the Outcome Agreement are also on target.

A robust framework is in place to manage performance but there is a lack of quality and consistent application within some departments limiting the ability to hold services to account

94 A coherent framework for managing performance is in place. This is diagrammatically demonstrated in key Council documents as a tiered 'wedding cake' structure that cascades the Council's priorities through a hierarchy of plans and strategies from the high-level outcomes agreed with partners down to plans and objectives for individuals.

95 This framework is supported by a comprehensive and well-established electronic system for collecting and reporting performance information (PIMS) that provides a sound basis for decision making. PIMS is used to record extensive amounts of performance data and generate reports for Members and senior managers. Service business plan actions and performance measures are included in PIMS and are updated quarterly. All Members have access to PIMS and Executive Board Members are fully trained in its use, although not all engage and use the system.

96 Performance information is widely available. It is reported regularly to CMT, quarterly to the Executive Board, six-monthly to scrutiny committees with an annual review of performance to Full Council. Detailed performance information is also reported annually in the ARIP. All reports are accompanied by a summary narrative, explaining any variances from targets and commenting on any areas of underperformance.

97 Responding to Members' concerns about the complexity of information being reported, the Council has just introduced a simplified dashboard style of reporting for each portfolio and is making greater use of exception reporting. Executive Members have also been issued with tablet devices that more effectively display performance trends in each service but that allow Members to drill down into the detail as required. This is helping to improve Members' awareness of service performance and is strengthening their ability to challenge performance. However, no matter how good the PIMS system is variations in the frequency of updates from services, together with some gaps in the information presented can reduce the effectiveness of this challenge.

- 98 A productive relationship between the Executive Board and scrutiny committees allows Task and Finish activity to provide recommendations for the Executive Board in a number of areas such as welfare reform, returning empty homes to use and tackling poverty. The Council is aware that there is scope to further strengthen the role of scrutiny committees in managing performance and is working on this.
- 99 The Council is gradually reducing its reliance on national performance indicators, completed actions and output measures to monitor the progress it is making. The systems thinking approach used in the Transform Innovate and Change (TIC) programme is raising awareness of the value of measures based on outcomes, particularly in fostering the right level of customer service. Some services are reviewing their reliance on performance indicators, concentrating only on those that are most useful while others are developing their own suite of indicators, replacing traditional input/output measures with outcome measures based on customer need. Good progress is being made on this issue in some areas, for example, in the Communities and Education directorates. However, there are no effective corporate mechanisms to share and learn from pockets of good practice as they emerge. Learning opportunities that do exist are mainly at heads of service level and through operational staff forums.
- 100 A performance culture is growing but the pace of change varies across the Council. The Council does not consistently use the extensive performance data it gathers to identify opportunities for improvement.
- 101 Despite the availability of a corporate template, the quality of business plans is highly variable; a few are sound, while others are barely fit for purpose, largely descriptive with few measurable actions or outcomes. Whilst the corporate performance unit provides timely and effective support to heads of service and directors, there is a lack of quality and consistent application within some departments limiting the ability to hold services to account. The Council has, through its refreshed CMT, a good opportunity to strengthen leadership on performance issues and further consolidate the progress the Council is already making.

Arrangements to manage risks are in place but there are some significant weaknesses at both Member and officer level

- 102 A clear framework is in place to manage corporate and project risks, with dedicated senior political and officer leadership and risk champions at departmental level. Risks are overseen by a risk management steering group which includes political representation from the Council's Executive. Project risk registers are the responsibility of individual teams. Officer support is provided by a risk management unit with a dedicated budget and staff. However, the extent of wider political involvement in risk management is limited, which hinders a wider understanding of its role in managing performance and improvement.
- 103 The Corporate risk register is web-based, with departmental access to maintain their risk registers. It is regularly updated and reviewed twice a year. The Council also regularly reviews its Risk Management Strategy. It is currently developing its sixth Strategy with the assistance of consultants to provide challenge and an external perspective. In response to concerns raised in our Safeguarding review the Council is also developing a new risk strategy for Safeguarding. However, the extent to which departmental risk registers are regularly updated is variable and not corporately monitored.
- 104 Risk management is clearly incorporated into business continuity and emergency planning and the Council can demonstrate that it is integral with the development of new strategies such as affordable housing. A consideration of risks is now part of formal decision making. Committee report templates require that risks associated with both taking action or failing to take action are addressed before a formal decision is made, although the rigour with which this is applied can vary.
- 105 Key strategic risks are reflected in business plans, especially where budget implications are involved but the extent to which risk management is integral to business planning is limited. Some business plans do not link service level risks or mitigation action to their respective departmental risk registers. Others include an assessment of risks but do not consider mitigation measures. A key weakness of business plans is that risks associated with interdependencies between the actions (or inaction in response to budget challenges) of one service on another are not routinely taken into account.

106 Unlike most authorities, the Council's corporate risk register is not overseen by the Audit Committee. The Audit Committee receives the minutes of the risk management steering group but not the register itself. This prevents the Audit Committee delivering its remit on risk and precludes any wider political or public involvement in the Council's approach to managing risks. It is unclear how this arrangement contributes to the Council's stated aim to become the most open and transparent council in Wales.

Reporting of performance to the public is open, transparent, fair and balanced

107 Public reporting of performance is fair and balanced. The ARIP is clearly laid out and presents a comprehensive picture of what the Council is aiming to achieve, the progress it is making and how its performance compares with other councils in Wales. The Council's wider ambitions for the community and improvement priorities are clearly explained as is the contribution of partners to delivery. Each priority outcome and KIOIP is presented in a consistent way, setting out what the Council has done, what it aims to achieve together with the key measures it will use to monitor progress.

108 A section entitled 'Is anyone better off?' helps the reader understand the difference the Council is making. The use of case studies, survey results and inclusion of feedback from users helps bring the data to life. Budget information is included, together with the progress the Council is making in securing savings and improving its governance arrangements.

109 The combined review of past performance with the actions the Council plans to take next within a single document allows the reader to form a balanced picture of how well the Council is performing. The ARIP is very lengthy and detailed but there is also a useful summary, and together they provide all the information the reader could need. The ARIP and summary are published in Welsh and English, with appropriate arrangements for publicity. The report is easy to find on the Council's website.

110 Results from the National Survey of Wales (2015) indicate that 42 per cent of people responding think that the Council is good at letting them know how well it is performing, placing Carmarthenshire seventh out of 22 local authorities.

111 However, although information from partners is included in the ARIP, the Council's analysis of the effectiveness of partnerships is not fully developed making it difficult to properly evaluate whether a partnership is worth pursuing or not.

112 The Council is continuously looking at ways to improve the ARIP to make it more transparent and easy to follow, without compromising the level of detail. This year, the Council added a colour-coded summary table to show at a glance performance trends across 43 key indicators, illustrating whether targets had been met, the overall direction of travel and any changes in how performance compares with the rest of Wales. The ARIP is subject to scrutiny committee challenge on performance issues prior to its publication and there may be scope to extend this to include presentation aspects and ease of understanding.

Proposal for Improvement

P6 Improvement Planning:

- provide clearer direction and professional level challenge on all performance management issues to ensure consistent application of the Council's performance management framework and sharing of good practice.

The Council, in collaboration with partners, is continuing to improve performance across its priority areas

- 113 The Council's arrangements are enabling it to continue to deliver improved outcomes for local people, despite the increasingly challenging budget pressures it faces. Frontline services have been protected as far as possible, as a result of budget decisions and more efficient ways of working. Overall performance as measured by performance indicators continues to improve. According to national indicators for 2014-15 performance in 60 per cent of performance indicators is above average for Wales compared with 51 per cent the previous year. The percentage of performance indicators that represent best performance in Wales has steadily increased over the past five years to 36 per cent. Furthermore, results from both the Citizens Panel and the National Survey of Wales demonstrate that public satisfaction with the Council is improving. According to the 2015 National Survey of Wales 57 per cent of residents are both satisfied with the Council and feel that it provides high-quality services, representing a five per cent improvement on the previous year and placing it sixth out of 22 councils in Wales. Results from the Citizens Panel in 2014 back this up, with 58 per cent of people satisfied with the Council, an increase from 52 per cent in 2012.
- 114 These are encouraging results at a time of increasing austerity and the need for tough spending decisions. We will report in more detail about the Council's service performance in our next Annual Improvement Report.

Appendix 1 – Status of this report

The Local Government (Wales) Measure 2009 (the Measure) requires the Auditor General to undertake an annual improvement assessment, and to publish an annual improvement report, for each improvement authority in Wales. This requirement covers local councils, national parks, and fire and rescue authorities.

This report has been produced by staff of the Wales Audit Office on behalf of the Auditor General to discharge his duties under section 24 of the Measure. The report also discharges his duties under section 19 to issue a report certifying that he has carried out an improvement assessment under section 18 and stating whether, as a result of his improvement plan audit under section 17, he believes that the authority has discharged its improvement planning duties under section 15.

Improvement authorities are under a general duty to 'make arrangements to secure continuous improvement in the exercise of [their] functions'. Improvement authorities are defined as local councils, national parks, and fire and rescue authorities.

The annual improvement assessment is the main piece of work that enables the Auditor General to fulfil his duties. The improvement assessment is a forward-looking assessment of an authority's likelihood to comply with its duty to make arrangements to secure continuous improvement. It also includes a retrospective assessment of whether an authority has achieved its planned improvements in order to inform a view as to the authority's track record of improvement. The Auditor General will summarise his audit and assessment work in a published Annual Improvement Report for each authority (under section 24).

The Auditor General may also in some circumstances carry out special inspections (under section 21), which will be reported to the authority and Ministers, and which he may publish (under section 22). An important ancillary activity for the Auditor General is the co-ordination of assessment and regulatory work (required by section 23), which takes into consideration the overall programme of work of all relevant regulators at an improvement authority. The Auditor General may also take account of information shared by relevant regulators (under section 33) in his assessments.

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