



Well-being Objective 13 Better Governance and use of Resources

Better Governance

We have improved performance management arrangements

We have:

- ◆ produced a Performance Management Framework
- ◆ improved engagement and assurance on business planning to improve self-assessment
- ◆ introduced more integrated quarterly performance management monitoring and assessment

Why this Well-being Objective is important

- ⊙ The general purpose of the Well-being of Future Generations Act (Wales) 2015, is to ensure that the governance arrangements of public bodies for improving the Well-being of Wales take the needs of future generations into account. To make this work there are key areas of corporate change that are required by the Act.
- ⊙ There are increasing demands and expectations yet less resources are available. Under these conditions we need to work even more efficiently and effectively to maintain services and improve where we can, delivering 'more (or even the same) for less'.
- ⊙ The way we work needs to focus on the long term, working in partnership and collaboration, involving people more, preventing problems before they materialise and ensuring we work in an integrated way to maximise our resources and reduce duplication; one of the ways we do this is through the Public Services Board (PSB).

1 Corporate Planning	Covered by Better Governance
2 Performance Management	
3 Workforce Planning	
4 Financial Planning	Covered by Better Use of Resources
5 Assets	
6 Procurement	
7 Risk	



How well are we doing (and how do we know)? 📄 Sources of evidence

Success Measures / Explaining the Results



71.2% of people agree that they can access information about us in the way they would like to
(previously 72.4%)
(Welsh average 74.9%)

74.6% of people know how to find what services we provide
(previously 72.1%)
(Welsh average 75.8%)
Source: National Survey for Wales

35.5% of people agree that they have an opportunity to participate in making decisions about the running of our services
(previously 9%)
(Welsh average 33.8%)



Staff sickness
11.4 days
per year
(previously 7.7 days)



According to the 2019/20 National Survey for Wales:

- ⊙ **71.2%** of participants agreed that they **could access information about us in the way they preferred**, below the Welsh average of 74.9%, and in 17th position.
- ⊙ **74.6%** agreed that **they knew how to find what services we provide**; below the Welsh average of 75.8% and in 13th position in Wales.
- ⊙ 2021/22 National survey for Wales results published in July 2022 shows that **35.5% agreed that they have an opportunity to participate in making decisions about the running of our services**, this is a vast improvement on the 2019/20 result of only 9% and is above the Welsh average of 33.8%. There has been a general increase across all authorities and comparatively, we have moved up to 5th position from 21st previously.

Staff Sickness

- ⊙ **Sickness figures** at the end of 2021/22 of **11.4 FTE days** is 3.7 days higher than last year and above the 2019/20 Welsh average of 11.2 FTE days (Authority 2019/20 performance was 10.74 FTE days). This is our highest sickness figure since 2008/09 (11.7 days) **However, it is important to note that this has been impacted by COVID-19 related sickness absence, which accounted for 2 FTE days per employee during 2021/22.** National benchmarking data indicates this increase is evidenced across all industries particularly sectors delivering frontline/operational services where working from home was limited.
- ⊙ The service areas with the highest sickness absence figures are Waste & Environment, Adult Social Care, Access to Education and Housing Property & Special Projects and Special Schools which are mainly front-line operational services which have been at the forefront of supporting our communities during the pandemic. The causes of absence are monitored and the impact and legacy of COVID-19 continues. People Management division provides advice and support for managers, who have the responsibility to manage attendance, they are provided with sickness data and analysis to plan appropriate action to ensure cases are managed and employees supported, in line with our sickness policies and guidelines.

Progress on the steps we are taking to achieve this Well-being Objective

Corporate Planning

- ⊙ To judge the progress of the Corporate Strategy we set out a table of 44 success measures. Despite being blindsided by the COVID-19 Pandemic, over the last 5 years 60% of these measures have improved since the start of the Strategy. **See Appendix 2.**
- ⊙ The Corporate Strategy was updated twice during its course to make sure that our Well-being Objectives were still relevant and we consulted on them each year to ensure continued support. For each of our 13 Well-being Objectives we identified the key steps we were taking to achieve them and then via business plans identified key actions and measures for each step.
- ⊙ During 2021/22 it was evident that Scrutiny Committees wanted to see an improvement in the measurements and actions set out in business plans so that they could hold the Services to account and see what success looked like. As a result of this feedback, and in response to new Local Government & Elections Act requirements relating to performance and governance, Business Plan measurement and SMART Action planning has been improved.
- ⊙ To further strengthen the development of departmental business plans an officer **Engagement and Assurance process** was set up during 2021/22 to discuss departmental business plans with each Departmental Management Team.

Performance Management

- ⊙ During 2021/22 a **new Performance Management Framework was introduced.** This framework sets out the Council's approach to monitoring and managing the performance of the Council's services.
- ⊙ Actions and targets to deliver the Corporate Strategy are monitored on a quarterly basis. The Corporate Management Team, Cabinet Members and Scrutiny committees receive quarterly Performance Management reports as well as the end of year report.
- ⊙ During 2021/22 **we developed a more integrated quarterly performance monitoring approach.** These more analytical reports added Member Task and Finish Scrutiny investigation findings, customer feedback (complaints and compliments) financial, internal and external audit findings, risk, people, asset management and other relevant data to build up a more rounded picture of progress.

INTERNAL AUDIT



REVIEW OF PERFORMANCE MANAGEMENT

The overall objective of the review was to assess the adequacy of the performance and reporting arrangements in place.

ACTION

An action plan has been drafted to improve this rating.

ASSURANCE RATING

HIGH	
ACCEPTABLE	✓
LOW	



As part of our response to the new Local Government and Elections (Wales) Act 2021 we requested support from the Welsh Local Government Association to assess and challenge the adequacy of the Council's self-assessment arrangements and to provide advice on what further developments would encourage a culture of continuous improvement.

- ⊙ As a Council we already have a lot of data that we report and this needs to be better harnessed and consolidated. We want to make better use of data and in February 2022 we have set up a 'Data Insight' unit to corporately ensure that we become a data driven authority.
- ! We are taking a more critical assessment approach to producing the Annual Governance Statement so that it does not just set out what arrangements we have in place but how well they are working, how we know and what can we do better. We will also improve the timescales for its production.

Workforce Planning (People Management)

Carmarthenshire County Council has some 8,000 employees who each contribute to the achievement of our Corporate Priorities. We ensure that all staff are managed and developed in a fair and consistent way.



- ⊙ Our staff are encouraged to develop, and we are accredited with Investors in People.
- ⊙ Following Local Government Elections, we will **ensure learning & development is fully aligned with corporate priorities**, with needs and transformation plans integrated into our new Corporate Strategy.
- ⊙ The management of attendance and supporting **the well-being of staff** is a high priority for the Council. A robust attendance management framework and policy is in place and the Occupational Health function offers well-being support and advice with the aim of keeping people in work, providing advice and guidance on healthy living, stress management and mental health in the workplace. This has been particularly important during the COVID-19 pandemic where support to staff has been stepped up via well-being initiatives and COVID-19 specific policies.
- ⊙ During 2021, a revised attendance management policy was introduced and associated e-learning to further support managers to manage attendance effectively. This is a priority for the Council, and management information is regularly provided to the Corporate Management Team and service managers for monitoring purposes.
- ⊙ Using existing governance arrangements (People Strategy Group) we will need to review our workforce strategy in light of the pandemic to support the organisation to recover.
- ⊙ During 2021 we held dedicated Local Government Association (LGA) facilitated workforce planning sessions with Corporate Management Team and Heads of Service; and developed an online workforce data dashboard for Heads of Service / Service Managers. We now need to build on this learning and consider the impact of COVID-19 on our workforce and develop a Strategic Workforce Plan.
- ⊙ Our annual **equal pay** audit does not suggest any evidence of discrimination within the pay structures, nor the allowances paid. The pay gaps are generally because of segregation of the sexes between job types rather than application of the allowances. As required, the Council publishes a Pay Policy each year to provide transparency on setting the pay of its employees. The Pay Policy is agreed by Full Council and is published on the Council's website.
- ⊙ The COVID-19 pandemic has accelerated a move to **agile working** and it is intended that this will inform how the Council manages its workforce in the future through smarter and better ways of working. This will impact on accommodation requirements and contribute to our ambition to become net zero carbon by 2030 by reducing the need to travel. The Staff Travel Policy will be reviewed to reflect the move to new ways of working.
- ⊙ Our Whistleblowing Policy is being used by employees to report serious concerns which may be in the public interest. Online learning, promotion of the policy and monitoring of whistleblowing complaints continues to ensure that employees are aware of it.

Springing Forward - Strategic management of its workforce



Audit Wales undertook an all-Wales project to examine the local government overall arrangements and approach to transforming, adapting, and maintaining the delivery of services. For Carmarthenshire it found that - *The Council is improving the strategic planning for its workforce and is taking action to address staff capacity issues in key service areas but recognises that performance monitoring of workforce management needs strengthening.*

Ensuring Effective External Communication

Since the introduction of *My Hwb* account (for online services and payments), 78,163 residents have signed up for the service. We're adding more services online and reviewing our existing e-forms to ensure that they are easy to use.

- ⦿ The Hwb in Ammanford, Carmarthen and Llanelli offer pre-booked appointments and drop-in advice to an average 8,000 residents per month, as well as providing advice and access to training and employment support. This had to be taken forward in a different way during 2020/21 due to COVID19 restrictions and the establishments having to be closed. Customers have been able to contact online and telephone and virtual meetings have been held. The increasing use of Social Media has allowed open engagement and conversations with members of the public. In addition to this Social Media is an excellent tool for promoting council services.
- ⦿ Throughout 2021/22 we have seen an increase in residents and businesses accessing information, support and council services online, the number of visits to our website has increased yet again this year by a further 7%.
- ⦿ The pandemic without a doubt has supported this increase to the website and how we present information bilingually, often at very short notice has been welcomed and complimented by the public.
- ⦿ Accessibility of information is key and we are proud to have this year passed the accessibility standard. It is so important to remember that residents, visitors and businesses are now accessing the website in various ways and interestingly 58.9% access using their mobile device. This is key when considering how to present information to ensure we engage to as a wider audience as possible.
- ⦿ Key stats CCC website 2021/2022
 - Pageviews: 6,144,228
 - Sessions: 3017983
- ⦿ Key stats for social media, email marketing and video
 - 19.3m Twitter reach
 - 8.82m Facebook reach
 - Published 3259 posts
 - Dealt with 4055 'inbound' posts, enquiries via comments, written on our wall or sent as a direct message
 - 53.3k link clicks
 - Facebook – New followers – 1,201. Total followers: 20,451
 - Twitter – New followers – 372. Total followers 11,151
 - 443,141 emails sent to MyAccount, businesses and 3rd sector. 267,018 unique opens.
 - Video – 115,800 views

Is anyone better off?

Tackling Employee Poverty

The Council continues to support its lowest paid employees and workers by **continuing to pay the Real Living Wage supplement** to ensure that our lowest paid receive the equivalent of £9.90 per hour (including fixed allowances).

What and how we can do better

Our delivery plan to achieve this objective

Ref	Actions and Measures	Date/Target	Owner/Resp. Officer
A	Corporate Planning		
1	Following Local Government Elections in May 2022 and the publication of the new administrations manifesto we will reset the Corporate Strategy and Well-being Objectives (15488)	July 2022	Gwyneth Ayers
2	We will further develop business planning processes and engagement and assurance approaches (15496)	July 2022	Gwyneth Ayers
B	Performance Management		
1	We will continue to develop the Performance Management Framework and our self-assessment processes (15496 & 15487)	March 2023	Rob James
2	We will continue to develop our Integrated Quarterly Performance Management Observations reporting (15496)	March 2023	Rob James
3	We will improve on the timescale for producing the Annual Governance Statement (16134)	March 2023	Helen Pugh
4	Develop an engagement and consultation plan for the authority (15580)	March 2023	Deina Hockenull
C	Workforce Planning (People Management)		
1	We will develop a new Transformation Strategy; ensuring that Learning & Development priorities and programmes are fully aligned with corporate priorities and needs; further developing the Council's Leadership and Management Programme to support key corporate priorities (15516)	September 2022	Jon Owen
2	Further improve our recruitment processes via the introduction of new integrated recruitment IT system. (IIP) (15512 & 15507)	March 2023	Alison Wood / Jon Owen
3	We will evaluate the employee experience and undertake research to develop a Workforce Engagement Strategy that will underpin the new workforce strategy (15499 & 15500 & 15501)	June 2022	Cheryl Reynolds
4	We will develop more proactive preventative solutions such as promoting good health and educating employees on healthy lifestyle choices (15502)	March 2023	Heidi Font
5	Developing a set of performance and outcome measures that reflect the Council's ambitions for its workforce (16135)	March 2023	Cheryl Reynolds
D	Ensuring Effective External Communication		
1	Deliver the council's corporate communications strategy following the key principle of <i>One Council, One Vision, One Voice</i> . As part of the launch of this strategy, communicate and embed a corporate communications standard across all departments to ensure the basic principles of communication are understood and utilised by all - for example, communications are always accessible, bilingual, friendly and with a clear call to action (15569)	August 2023	Deina Hockenull

Making Better Use of Resources

Through careful financial planning we have been able to set a balanced budget that will support the Council to continue delivering vital services and will allow us to continue to provide first class services to the residents and businesses of Carmarthenshire.

Why this Well-being Objective is important

- There are increasing demands and expectations yet less resources are available. Under these conditions we need to work even more efficiently and effectively to maintain services and improve where we can, delivering 'more (or even the same) for less'.

The general purpose of the Well-being of Future Generations Act (Wales) 2015, is to ensure that the governance arrangements of public bodies for improving the Well-being of Wales take the needs of future generations into account. To make this work there are **7 key areas** of corporate change that are required by the Act.

- Financial Planning
- Assets
- Procurement
- Risk

Better Use of Resources




How well are we doing (and how do we know)? Sources of evidence

Success Measures / Explaining the Results




5.85% increase of online payments (From 53,454 to 56,582 transactions)

Financial Impact:

We have administered and have paid: 
£78m of grants to support local business
£3.4m of Winter Fuel Support Scheme payments.
£397.6k of Discretionary Housing Payments.
Over £4m of Self Isolation Support Payments and 10,754 applications received.



Through our delivery of Community Benefits **548 person weeks** of targeted recruitment & training was delivered

9.9% of people agree that we ask for their views before setting our budget 
(previously 11.3%)
(Welsh average 9.2% and in 9th place)
(Source: National Survey for Wales)

Online payments

- Due to the COVID-19 Pandemic and with increased access to online services, this has created a natural shift with many customers contacting us, submitting forms and documents and paying for our services electronically with a 5.85% increase in the number of online payments from 53,454 in 2020/21 to 56,582 transactions during 2021/22.

Organisational 'running costs'

- We have administered a total of £78 million from Welsh Government Grants to the Carmarthenshire Business Community to support businesses during these challenging times.
- Since November 2021, we have administered the Winter Fuel Support Scheme and processed 9,480 cases and have paid out £3,409,200 to support Carmarthenshire residents.
- We have paid out £397,584 of Discretionary Housing Payments and up to mid-March received 10,754 Self Isolation Support Payment applications and paid out over £4 million to eligible claimants.

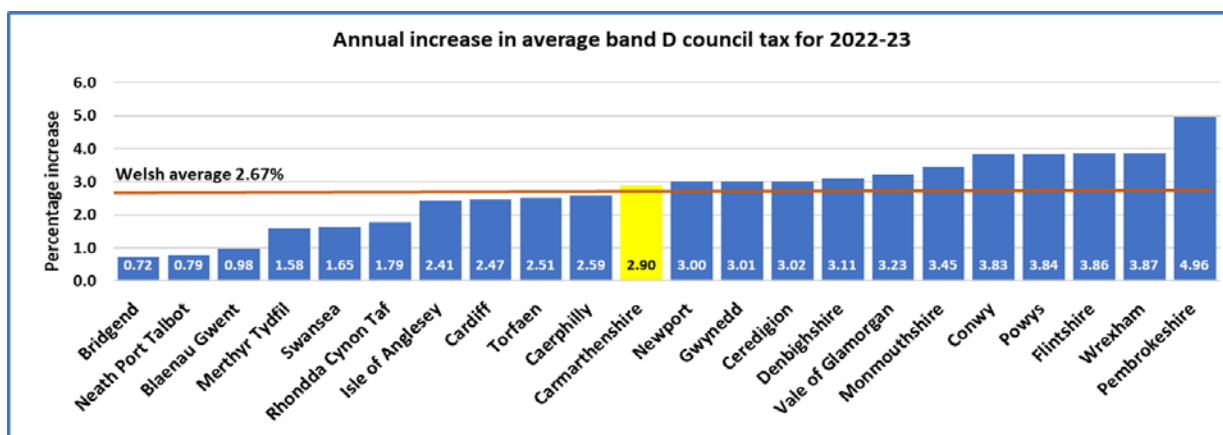
- Through our delivery of Community Benefits over 548 person weeks of targeted recruitment and training was delivered in 2021/22 through the Council’s 21st Century Schools project across the County.
- We have claimed £27.4 million from Welsh Government via hardship claims to support additional COVID-19 services. We have also claimed £4.5million relating to claims for loss of income.
- Despite inflationary pressures on a truly unprecedented scale, the Council was able to set a balanced budget of £416 million which provided sufficient funding to sustain service levels, realised efficiency savings where possible and curtailed council tax as much as possible to 2.5%.

People agree that the Council asks for their views and as part of Carmarthenshire County Council budget consultation we sort views of members and public before setting the budget

- The 2019/20 National Survey for Wales showed the number of participants agreed that *we ask for their views before setting our budget* was 9% (Welsh average 9.2%), this is a decline on the previous year of 11.3% and in 9th position (previously 7th). Due to COVID-19 there is no updated data available for the measure, although we continued to hold our annual budget consultation and engaged with councillors and members of the public.

Progress on the steps we are taking to achieve this Well-being Objective

Financial Planning



- Carmarthenshire has the 11th lowest annual % increase at 2.90% and just above the Welsh average of 2.67%. This is the lowest % increase since 2012/13 at 2.38%. The Council Tax levels in Carmarthenshire is the 9th lowest in Wales (Band D) at £1,799.92 an almost £320 less than the highest level in Wales and just above the Welsh average of £1,777.18.

- Audit of Financial Statement** – An unqualified Audit report was received from Audit Wales on all statements (financial year 2020-21) and the audit found no major issue other than generic-all Wales matters, considering we have undertaken £140 million of additional COVID-19 related funding across dozens of specific grants.



- A mixed methods approach to ascertain views on the 2022-25 budget took place and this was publicised in local and regional press, local radio advertisements and via equality groups including Equality Carmarthenshire, Ageing Well Forum, Carmarthenshire Disability Coalition of Action and via Town and Community Councils. There was a low response rate, possibly due to COVID-19 restrictions and concerns. Responses were received via the Council’s online consultation page on the website, emails were submitted together with social media responses via Facebook and Twitter and all comments and views were taken into consideration. [REVENUE BUDGET 2020 to 2023 \(gov.wales\)](https://gov.wales/revenue-budget-2020-to-2023)

- There have been 3 Internal Audits completed during 2021-22 looking at the following areas and their audit findings were:

INTERNAL AUDIT



RATING	COUNCIL TAX	NNDR	AGS
HIGH			
ACCEPTABLE	✓	✓	✓
LOW			

We are tracking action plans to improve these ratings

Assets

- Just under £2.9m was generated from Capital receipts during 2021/22 which exceeds our target by almost £0.75m, this covers some of the £0.4m shortfall in 2019/20 and £1.8m shortfall 2020/21.

SPRINGING FORWARD – STRATEGIC MANAGEMENT OF ASSETS



Audit Wales undertook an all-Wales project to examine the local government overall arrangements and approach to transforming, adapting, and maintaining the delivery of services. Overall, it found that: *The Council is strengthening its arrangements for asset management and recognises that there are opportunities to use the sustainable development principle more to improve this work and that performance management of assets could be improved.*

Procurement

- We have addressed the key findings, highlighting good practice and recommendations from the ‘*Procuring well-being in Wales*’ report (published 25/02/2021) from the Office of Future Generations Commissioner for Wales [procuring-well-being-in-wales](https://www.futuregenerations.wales/procuring-well-being-in-wales).



- We have amended our Sustainable Risk Assessment (SRA) template which ensures that the sustainability issues such as environmental, social, economic & cultural issues can be factored into the specification for individual tenders to incorporate elements of the Well-being of Future Generations Act. We also include service provision information relating to the 5 ways of working i.e. Long Term, Prevention, Integration, Collaboration & Involvement. We have produced an Ethical Employment in Supply Chains Policy and drafted the Council’s first annual written statement on the steps taking during the financial year to ensure that slavery and human trafficking are not taking place in our organisation and our supply chains.

Risks

- The Corporate Risk Register is reported to the Governance and Audit Committee every 6 months and is reviewed by the Corporate Management Team every quarter as part of the performance management information and in line with the Well-being of Future Generations Act. We use a “**Web Based Risk Register Software**”, which allows Departments to input, access, maintain and manage both Corporate, Service and Project Risks.



A TIC review that concluded in December 2021 noted that ‘*Although the COVID-19 pandemic initially impacted on the ability to progress the recommendations contained within the Audit Office Review and follow-up Internal Audit Review, a number of key actions have now been implemented and good progress has been made across the action plan in general.*’

Is anyone better off?

 <p>Sell2Wales</p> <p>Sell2Wales All our procurement opportunities over £25K are listed on the Sell2Wales website.</p>	 <p>Community Benefits Community Benefits in Public Sector Procurement ensures that wider social, economic and environmental issues are taken into account in our tendering activity.</p>	 <p>Find a Tender Service Find a Tender Service (FTS) is free to use and displays information on public sector contract opportunities in the UK.</p>	 <p>Busnes Cymru Business Wales</p> <p>Business Wales Business Wales can help small or medium sized enterprise SME (employing up to 250), who want to improve their chances of winning public and private sector contracts.</p>	 <p>Terms and Conditions These terms and conditions set out the basis of the relationship between the Council and the successful supplier.</p>
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Business is about people

We value our diverse range of suppliers and acknowledge the importance of having access to a quality and diverse supplier base, recognising that **business is about people by talking to them, listening to them, and understanding them**. To this aim we have held 7 Live Tender Webinars virtually via Teams with a total of 164 suppliers in attendance over the last financial year. The aim of these sessions was to inform prospective tenderers of the forthcoming tendering opportunities and the requirements of these service/goods.

We also understand that the prospect of tendering for business with us can sometimes appear to be a daunting task. Therefore, we have actively engaged with 63 suppliers through a series of first point of contact sessions (1-2-1 meetings) over the same period, engaging with suppliers who are interested in working with the Council.

A Meet the Buyer Event was organised by the appointed main contractor Bouygues for the Pentre Awel Zone 1 Development and was held at Parc y Scarlets, Llanelli. A total of 107 suppliers/contractors attended the event throughout the day with Procurement and Community Benefits Officers representing the Corporate Procurement Unit at the event. This Meet the Buyer event was aimed at giving opportunity to second tier, local suppliers to learn of potential sub-contracting opportunities.

We have developed a Supplier Guide for current and potential contractors, suppliers, and providers with the aim to help provide organisations who want to work with us a clear understanding of how to bid for contracts and what is required during the quotation or tendering process. This is now available electronically and appears on our website [Supplier Guide to Tendering \(gov.wales\)](#). It contains a variety of helpful information, advice, and guidance in relation to procurement and “How to Tender” with Carmarthenshire County Council.

Supplier Guide to Tendering

In this section

- 1. Introduction
- 2. What do we spend our money on?
- 3. Where and with whom is our money spent?
- 4. How We Buy
- 5. What rules, regulations & procurement procedures do we follow?
- 6. How does the tendering process work?
- 7. Where do we advertise our contract opportunities
- 8. What is included in a Tender document/package?
- 9. The Dos and Don'ts of Tendering
- 10. Supplier Engagement Events
- 11. Getting Ready to Tender
- 12. Procurement Glossary
- 13. Advice and Support

What and how we can do better

Our delivery plan to achieve this objective

Ref	Actions and Measures	Date/Target	Owner/Resp. Officer
A	Financial Planning		
1	Use of the Council's reserves to invest in the County and support future development (Moving forward in Carmarthenshire) <i>16063</i>	March 2023	Chris Moore /Randal Hemingway
2	Ensure the Council manages its budgets effectively and prudently (Moving forward in Carmarthenshire) <i>16064</i>	March 2023	Chris Moore /Randal Hemingway
3	We will undertake the closure and Audit of the Accounts within the appropriate timescales <i>16061</i>	June 2023	Chris Moore /Randal Hemingway
B	Assets		
1	We will commence work on the transformation of the former Debenhams Store to provide a multi service hub covering health, education and leisure	March 2023	Jason Jones/ Stuart Walters
2	Delivery of Phase 1 Pentre Awel providing business, research, education, community healthcare and modern leisure facilities <i>15155+12985</i>	March 2023	Jason Jones/ Steffan HG Jenkins
3	We will apply and embed the sustainable development principle in the way it plans, delivers and monitors the management of its assets # Audit Wales Recommendation -Springing Forward <i>16136</i>	March 2023	Jason Jones/ Stephen Morgan
4	<i>We will improve the performance management of our assets.</i> <ul style="list-style-type: none"> developing a set of performance and outcome measures that reflect the Council's ambitions for its assets and monitor these measures at a corporate level, including reporting to overview and scrutiny committee benchmarking performance on asset management with other organisations # Audit Wales Recommendation-Springing Forward <i>16137</i>	March 2023	Jason Jones/ Stephen Morgan
5	We will review and formally adopt the Council's Corporate Asset Management Plan by March 2023 <i>15541</i>	March 2023	Jason Jones/ Stephen Morgan
C	Procurement		
1	We will work with departments to deliver compliant tender exercises through the implementation of a category management approach. <i>15286</i>	March 2023	Chris Moore /Helen Pugh /Clare Jones & Gemma Clutterbuck
2	We will continue to develop our approach to early engagement of Local Businesses. <i>15288</i>	March 2023	Chris Moore /Helen Pugh /Clare Jones & Gemma Clutterbuck
D	Risks		
1	Continue to implement the action plans developed in response to the WAO/Internal Audit Review, with priority to be given to ensuring that the Risk Toolkit is formally adopted and used to inform development sessions for managers at a divisional level and dedicated development sessions for Departmental Risk Champions. <i>15292 (Sub Actions: 14302, 14303 & 16040)</i>	March 2023	Chris Moore /Helen Pugh /Julie Standeven



View our [detailed progress commitments and targets here](#) for 2021/22 against this objective