



WALES AUDIT OFFICE
SWYDDFA ARCHWILIO CYMRU

Annual Improvement Report 2015-16

Denbighshire County Council

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This Annual Improvement Report has been prepared on behalf of the Auditor General for Wales by Gwilym Bury, Siân Clark, Fflur Jones and Jeremy Evans under the direction of Jane Holownia.

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Summary report

About this report

- 1 This Annual Improvement Report (AIR) summarises the audit work undertaken at Denbighshire County Council (the Council) since the last such report was published in July 2015. This report also includes a summary of the key findings from reports issued by 'relevant regulators', namely: the Care and Social Services Inspectorate Wales (CSSIW); Her Majesty's Inspectorate for Education and Training in Wales (Estyn); and the Welsh Language Commissioner (WLC). Nonetheless, this report does not represent a comprehensive review of all the Council's arrangements or services. The conclusions in this report are based on the work carried out at the Council by relevant external review bodies and, unless stated otherwise, reflect the situation at the point in time that such work was concluded.
- 2 Taking into consideration the work carried out during 2015-16, the Auditor General will state in this report whether he believes that the Council is likely to make arrangements to secure continuous improvement for 2016-17.
- 3 This statement should not be seen as a definitive diagnosis 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.
- 4 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.

2015-16 performance audit work

- 5 The work carried out since the last AIR, including that of the 'relevant regulators', is set out below.

Project name	Brief description
Wales Audit Office Financial Resilience Assessment	Review of the Council's financial position and how it is budgeting and delivering on required savings.
Wales Audit Office Annual 'Improvement Plan' Audit	Review of the Council's published plans for delivering on improvement objectives.
Wales Audit Office Annual 'Assessment of Performance' Audit	Review of the Council's published performance assessment, including testing and validation of performance information.
Wales Audit Office Performance management: Benchmarking social services costs against performance	Review across the North Wales councils to explore the value of the current social services performance indicators and the links, if any, with costs.
Wales Audit Office Performance management: Review of the Council's approach to alternative service providers	Review of the Council's arrangements to successfully select, implement and monitor effective alternative models of service delivery.
Wales Audit Office Governance: Review of scrutiny arrangements	Review of the Council's scrutiny arrangements and their effectiveness.
CSSIW: Inspection of safeguarding of looked-after children in foster care	Assessment of the effectiveness of the Council's services for looked-after children in foster care.
CSSIW: Review of the Social Services Department's performance 2014-15	Assessment of the performance of the Council's Social Services Department.
WLC: Review of the Council's Welsh Language Scheme	Assessment of the effectiveness of the Scheme in providing Council services to the public in Welsh.
Wales Audit Office Follow-up work	Assurance that the Council has appropriate corporate processes for responding to reports, tracking implementation of recommendations and reporting this to the appropriate committee.
Wales Audit Office National Reports	<ul style="list-style-type: none"> • The financial resilience of councils in Wales • Community Safety Partnerships • Income generation and charging • Council funding of third sector services

The Council, with sound financial management and scrutiny arrangements, continues to make progress in delivering improvements in most of its priority areas

- 6 Based on, and limited to, the work carried out by the Wales Audit Office and relevant regulators, the Auditor General believes that the Council is likely to comply with the requirements of the Measure and secure improvement during 2016-17. The Auditor General has reached this conclusion because:
- overall, the Council made good progress in addressing previously reported underperformance and it continues to deliver high-quality services but concerns remain in relation to safeguarding vulnerable adults;
 - the Council has appropriate financial management arrangements but needs to strengthen its approach to income generation; and
 - the Council's scrutiny arrangements support sound decision making and it has adequate corporate processes for responding to reports and recommendations from external regulators.

Recommendations

- 7 Given the wide range of services provided by the Council and the challenges it is facing, it would be unusual if we did not find things that can be improved. The Auditor General is able to:
- make proposals for improvement – if proposals are made to the Council, we would expect it to do something about them and we will follow up what happens;
 - make formal recommendations for improvement – if a formal recommendation is made, the Council must prepare a response to that recommendation within 30 working days;
 - conduct a special inspection and publish a report and make recommendations; and
 - recommend to Ministers of the Welsh Government that they intervene in some way.

- 8 During the course of the year, the Auditor General did not make any formal recommendations. However, lower-priority issues, known as proposals for improvement, are contained in our other reports but may be referred to later on in this report. We will continue to monitor proposals for improvement during the course of our improvement assessment work. He does, however, make recommendations that may be relevant to the Council in his Local Government National Reports. A list of recommendations contained in reports issued in 2015-16 can be found in [Appendix 3](#).
- 9 In addition, the Care and Social Services Inspectorate Wales (CSSIW), and the Welsh Language Commissioner (WLC) included areas for improvement in their inspection reports and letters issued to the Council during the year. These are available at www.cssiw.org.uk and www.comisiynyddygybraeg.org.
- 10 Estyn issued no inspection reports to the Council during 2014-15.

Detailed report



Performance

Overall, the Council made good progress in addressing previously reported underperformance and it continues to deliver high-quality services but concerns remain in relation to safeguarding vulnerable adults

Estyn's evaluation of school performance

- 11 The proportion of pupils eligible for free school meals in Denbighshire is just above the Wales average. This is taken into account when evaluating the performance in the authority.
- 12 The proportion of pupils achieving the Foundation Phase indicator¹ and the core subject indicator at key stage 2 has improved over the last three years, but at a slower rate than the Wales average. For both indicators, performance in 2015 is around the average for Wales.
- 13 At key stage 3, the proportion of pupils achieving the key stage 3 core subject indicator has improved over the last three years at a faster rate than the Wales average, and is in line with the Welsh Government benchmark for performance in 2015.
- 14 At key stage 4, the percentage of pupils achieving the level 2 threshold including English or Welsh first language and mathematics and the average capped points score has improved in recent years, but at a slower rate than the Wales average. In 2015, performance in the level 2 indicator including English or Welsh and mathematics is below the target set by the Welsh Government. The average point score has met the Welsh Government benchmark targets for the last three years.
- 15 In most of the indicators for primary and secondary schools, the performance of pupils eligible for free school meals is below the Wales average. For two of the last three years, attendance in primary schools has been better than that in similar authorities. In 2015, attendance is below the Wales average. In secondary schools, attendance has been below the Wales average for the last three years.

¹ The **Foundation Phase indicator** refers to the percentage of pupils who reach the expected performance (outcome level 5) in three areas of learning in the Foundation Phase: literacy, language and communication in English or Welsh first language; mathematical development; and personal and social development, wellbeing and cultural diversity.

The **core subject indicator** refers to the percentage of pupils who attain the level expected of them in mathematics, science and either English or Welsh as a first language. This equates to level 4 or above at key stage 2 and level 5 or above at key stage 3. The performance indicators for the Foundation Phase key stages 2 and 3 are based on teacher assessment. The performance indicators for key stage 4 are based on externally verified qualifications such as GCSEs.

Overall, the Council's social services perform well but safeguarding vulnerable adults and the quality of many domiciliary care agencies continues to be a concern

- 16 The CSSIW published its Annual Review and Evaluation of Performance 2014/2015 in October 2015 and this is available on [CSSIW's website](#).
- 17 CSSIW found that the Council continued to make good progress on its five-year plan to modernise its social services that will involve a transformation, not just of the pattern of social care services, but also in the shape of the workforce employed to provide care and support. The Council believes that cultural change will help it to prepare for the implementation of the Social Services and Wellbeing (Wales) Act 2014 and the delivery of sustainable social services. Elected members and staff are well briefed and understand the implications of the Act. Preparation for this during the year included the reorganisation of the senior management infrastructure, thereby creating a new department for community support services incorporating adult social services and homelessness services, and also the merger of children's social care with education into a single department at the beginning of 2016.
- 18 The Council continues to engage actively with people who use its services and CSSIW notes that the Council has also put into place a sound process to capture the experiences and views of young people including a robust use of social media. The CSSIW also found that the Council continues to demonstrate commitment, creativity and pragmatism in its response to 'More Than Just Words/Mwy Na Geiriau'², with clear evidence of excellent progress being made during the year illustrated by strategic leadership, championing, bilingual access for people and workforce training designed to heighten awareness and take-up of the Welsh language, and to increase the accessibility of social services in the language of need.
- 19 The Council continues to face substantial demographic changes within an uncertain financial climate. The CSSIW found powerful evidence that the Council has adopted a strategic approach to meeting these challenges. The Council is providing strong leadership in relation to promoting independence. Annual service challenge meetings and corporate governance arrangements held throughout the year reflect a culture within the Council of effective scrutiny of social care performance both with children and adult services.

² **Mwy na geiriau/More than just words: A Strategic Framework for Promoting the Welsh Language in Health, Social Services and Social Care** was published in 2012 by the Welsh Government Deputy Minister for Social Services. The aim of the framework is to ensure that organisations recognise that language is an intrinsic part of care and that people who need services in Welsh get offered them.

- 20 The Council has completed major structural changes to the management of both adult social care and children's services. The Council's approach includes a review of existing services; the introduction of innovative models of practice; integrated partnership development; and the exploration of the potential for regional commissioning for some services. In managing its budget reductions and altering its approach to front-line social care, the Council has chosen to reduce the number of qualified social workers employed in adult services and has replaced these with social care practitioners. Compared to 2013-14 there was a reduction during the year in social workers by 19 per cent (nine posts) balanced by the introduction of 24.8 full-time equivalent social care practitioner posts (including six reviewing officers). There is a different picture in children's social care services with an increase in social workers from the previous year of 21.47 per cent (seven posts). In order to assess the impact of these changes upon people receiving adult social care services the Council will need to adopt a rigorous approach to quality assurance. In 2014-15, the Council also commenced a detailed consultation programme on the future of their own three residential homes for older people which currently provide accommodation for 50 people and employ 100 staff. Adult services, which during the year became a function of the new Community Support Services, sought to sharpen its approach to commissioning during the year.
- 21 The CSSIW found there has been progress overall in the provision of adult social care in the County with the continuation of new initiatives promoting independence. The emphasis of the Council is to enable a greater number of people aged 65 years and over to remain independent. The introduction of the Single Point of Access illustrates an effective model of integrated social care and health partnership working, providing assessment and support for people at risk of deteriorating health. By the end of the year, the service was fully staffed including staff from the third sector and offering a bilingual service.
- 22 The Council provides strong direction and leadership in increasing the range of preventative and early intervention services available for older people. Denbighshire's Well-Being Plan illustrates the Council's strategic direction in seeking to enable people to become resilient and independent. The CSSIW found other examples of new initiatives such as the 'My Life My Way' project focusing on locally-based resources for people to seek advice, information and to retain resilience and independence. The Council also commenced a project aimed at assessing and intervening in loneliness experienced by older people. The Council took part in a national pilot to develop community hubs, enabling easy access to advice and information for the local population with the first of these community hubs operating 'community-led conversations' commenced in Corwen.

- 23 A focus with domiciliary care provision has been to move towards an outcome-based approach for the users of these services, although work to evaluate the quality of all providers and outcomes for services has yet to be undertaken. The pilot being undertaken by the Council to apply the National Outcome Framework aims to place the person at the centre of social work practice. This will therefore require a smarter and bespoke approach to commissioning, and greater clarity in the Council's approach to commissioning will be needed.
- 24 The CSSIW found, however, that the Council did not formally monitor the quality of many domiciliary care agencies during the year by carrying out visits to all providers. The Council acknowledges that all providers will need to be effectively monitored during 2015-16. During engagement meetings with CSSIW, the Council reported that 70 per cent of all 15-minute calls to people in their own homes were 'check calls'. Quality monitoring should include face-to-face interviews in addition to the existing methods employed, to enhance opportunities for listening to and evaluating the views of people who receive all types of domiciliary services. This will help to ensure that the support provided addresses their needs and informs future commissioning by the Council.
- 25 In recent years there has been an increasing number of people with learning disabilities and often complex needs from outside the county and even Wales who have been placed with independent providers (over 96 per cent) in Denbighshire but CSSIW found that there are significant numbers of people in these services unlikely to be known to the Council who may need at some point to access primary health and social care services, and the protection of the safeguarding processes operated by the council. The CSSIW concluded that further work is needed by the Council (and partners) to assess and predict future need and resource in this respect, and to take account of the potential impact of any step-down from intensive support and into community-based settings within the county.
- 26 The CSSIW concluded that despite increasing capacity for delivering safeguarding for vulnerable adults, performance in relation to the Protection of Vulnerable Adults (PoVA) has not made the gains anticipated, and performance continues to cause concern and that this remains an ongoing risk for the Council. The Council sought to strengthen capacity by extending the role of designated lead managers. Dedicated administrative support was also established towards the end of the year, training for staff provided, and monthly meetings held to review progress and share practice. Despite these developments, by the end of 2014-15 the same concerns noted in last year's CSSIW performance evaluation report remained, including timeliness and lack of consistency in the safeguarding process. The CSSIW observed that relevant agencies were not always being engaged, especially in early strategy discussions, and a recurring theme being an apparent lack of confidence of the designated lead managers, suggesting a need for further support and training. Clarity around the Council's threshold for accepting or rejecting PoVA referrals is also needed. Since publication of the Annual Review in October 2015, the Council has taken a number of steps to address the concerns of CSSIW including implementing new data collection and evaluation processes relating to all stages of the PoVA process and by ensuring that Single Point of Access personnel have the information they need in order to make timely referrals to the PoVA team. The CSSIW will also undertake a follow-up review on PoVA arrangements during 2016.

- 27 Partnership working remains strong in Denbighshire and, as noted last year, has enabled the development and delivery of restructured services and this has led to improved quality of care in the county. Senior officers from Denbighshire and Conwy councils met throughout the year in order to seek opportunities for future joint social care partnership working. The CSSIW notes that relationships with partner agencies are good at both individual and organisational levels, despite some challenges in engaging effectively at a strategic level, and it should therefore be of advantage to the strategic planning and decision-making for health and social care in the year ahead, that the Denbighshire Director of Social Services was made an associate member of the board of Betsi Cadwaladr University Health Board.
- 28 The CSSIW noted very good progress in the delivery of children's services and strong outcomes for looked-after children. The Council has put in place approaches designed to improve previously poor performance in relation to health, dental and personal education plans for looked after children. Towards the end of the year, impact was beginning to be made with health and dental checks progressing, however, both areas still fall below the Welsh average. In relation to health checks there has been an increase from 38.4 per cent to 73.5 per cent; and dental checks slightly improved from the previous year to 59.8 per cent. The Council significantly increased its performance and ensured that all looked after children have personal education plans in place and at 100 per cent, this is well above the Welsh average.
- 29 The CSSIW inspection in 2014-15 of the Denbighshire Fostering Service found there is a stable group of foster carers within the county and morale amongst foster carers was judged to be good. The Council is also working with other councils in North Wales to establish a regional approach to the recruitment of foster carers.
- 30 Outcomes for care leavers improved. Through the involvement of the 14+ team and the corporate parenting forum, there is positive engagement and indeed some success from the range of Council services in providing options to its looked-after younger people, including employment and apprenticeship opportunities. There was a big leap in the external qualifications points score achieved by the small cohort (four) of 16-year-old looked-after children at 438.50 points, reflecting an increase of 168 per cent from the previous year, becoming the highest in North Wales and significantly above the Welsh average. The Council's role as the 'corporate parent' for children and young people is illustrated through the Corporate Parenting Forum, in which senior managers and elected members scrutinise outcomes for young people and challenge performance. This is enhanced by the establishment of an improved approach to quality assurance arrangements by better engaging with and eliciting the views of young people.
- 31 During 2015-16, CSSIW undertook an inspection of the in-house Denbighshire Fostering Services. Findings from the individual local authority inspections and the CSSIW national overview report can be found on the [CSSIW website](#).

- 32 As part of the Wales Audit Office Social Services Sustainability work across the six North Wales councils, we produced a document for the Council that presented:
- future demand for social services in Denbighshire through benchmarking population projections for children and older people; and
 - a suite of graphical analyses that combined financial and performance data for social services in Denbighshire over multiple years and which also placed the Council within the context of the other 21 Welsh councils.
- 33 There were no recommendations or conclusions from this work as we provided each Council with a data pack that displayed information from a value-for-money perspective and facilitated a North Wales-wide workshop for Directors of Social Services and other key senior managers. We received positive feedback on the output and await to see how the Council uses this approach as part of its internal challenge processes.

The Council continues to produce well informed balanced evaluations of its performance and complies with the Local Government Measure 2009

- 34 The Council has, as in previous years, met its improvement reporting duties under the Measure and the Auditor General's October 2015 Improvement Assessment Certificate concluded that the Council had discharged its improvement reporting duties under the Measure.
- 35 The Council's Service Challenge arrangements have been in place for some years and continue to provide elected Members and managers with comprehensive and detailed position statements drawing on the available performance data and on the progress of major projects. As is the case, with the Council scrutiny committees however, the attendance record of Members at service challenge meetings has been variable during 2015. Often the only challenge comes from senior staff and a few elected Members. As we noted in last year's AIR the service challenges form an important strand in the Council's self evaluation process, enabling senior managers and elected Members to understand more fully how well each service is performing against targets and in the national context, and to identify what needs to be done in areas that are performing less well. If the Council's Service Challenge arrangements are to continue to perform this important role the level of Member attendance needs to return to previous levels.
- 36 The Council is also required to prepare and publish an Improvement Plan describing its plans to discharge its duties to make arrangements to secure continuous improvement in the exercise of its functions. The Auditor General's May 2015 Improvement Plan Certificate concluded that the Council had discharged its improvement planning duties under the Measure.

National indicators and the Council's own performance standards continue to present an accurate picture of performance

- 37 The Council's performance in 2014-15 declined very slightly, with 14 of the 25 of the statutory performance indicators in the top quartile. As in 2013-14 only four out of the 25 statutory all-Wales measures were in the bottom quartile and the Council continued to achieve further improvements across many of its service areas, such as further reducing waste sent to landfill. The Council has continued its approach of rejecting target-setting based on incremental improvement on the previous year's performance in favour of an approach based on achievement of the 'excellence threshold'. Excellence thresholds are usually based on the Council's performance being amongst one of the top six performing councils in Wales.
- 38 Our last three AIRs concluded that the Council's central policy team effectively oversee, co ordinate, and actively manage performance. This has enabled the Council to continue to deliver a well-understood and consistent system for performance management. This remains the case. The quality of the work produced by the central policy team has been further strengthened during 2015 by the introduction of a new Performance Management System.

Good progress has been made in addressing the previously reported underperformance in the provision of affordable housing and developing a new Council housing strategy

- 39 The Council has taken decisive action in 2014-15 to try to ensure a sufficient supply of affordable homes. Until this year the Council had consistently failed to meet its targets since 2011 and its performance was the worst in Wales in 2013-14. In 2013-14, of the 2,416 affordable homes built in Wales, only 16 were completed in Denbighshire. The Council recognised that it needed to improve its performance and the housing service was reorganised with the Head of Planning and Public Protection, together with the Head of Finance, Assets and Housing, taking on responsibility for all aspects of delivering affordable housing in Denbighshire. In 2014-15 a total of 74 affordable homes were completed in Denbighshire, although the corporate plan target of 570 new affordable homes to be completed between 2012 and 2017 is still unlikely to be achieved.
- 40 The Council recognised that the existing Housing Strategy did not set out clearly enough the roles and responsibilities for meeting the affordable homes target and a Task and Finish group of elected members and officers has been developing a new affordable housing strategy. The new housing strategy was approved by the Council in December 2015 and a detailed action plan sets out a series of measures which if all successfully implemented should ensure significant progress in increasing the provision of affordable homes in Denbighshire over the next five years.

- 41 As we reported in the last Annual Improvement report the Council's Improvement Priority for housing is broader than the provision of affordable housing. The Council continued its effective action to prevent homelessness in 2014-15 and, as in the previous year, remained in the top quartile for performance within Wales. The number of days taken to deliver disabled facilities grants was also low and represented top quartile performance amongst councils in Wales.

The Council has adopted alternative models of service delivery but it has only just started to develop an appropriate strategic framework and performance monitoring and scrutiny arrangements

- 42 With the prospect of ongoing financial cutbacks, more councils are considering the possibility of making significant changes to methods of service delivery in order to achieve greater financial security and protect services. It is important for councils to take these decisions with a complete range of information relating to service delivery options and that the strengths and weaknesses of each option are discussed and debated within context. This debate needs to take place at both officer and Member level together with robust public consultation.
- 43 Alternative models for service delivery can take many forms, the selection of which may be determined by the particular values of a council. For example, an approach of a 'commissioning council' might entail establishing a range of contracts with the private sector for the long term provision of services. There is also the example of the network of 'co-operative councils' which are undertaking a series of projects to explore and embed into practice new ways of delivering services and working in partnership with communities.
- 44 Each of these models brings associated risks that need to be identified when options are being considered and arrangements put in place to manage them as they are developed and put into practice. Given the wide range of potential options it would be beneficial prior to embarking upon initial research for the Council to establish its preferences for particular services – this could simply be a statement of the nature of arrangements it would not consider.
- 45 Different reasons and factors have contributed towards considering alternative ways to achieve effective service delivery. For example, the yet to be implemented SARTH³ project with neighbouring councils and local Housing Associations is pushing for change to a more modern and effective social housing allocations system, and the pressures of aging residential care units is driving the Council to look at extra care housing schemes provided by alternative providers.

³ SARTH (Single Access Route to Housing) is a partnership project between all the major social landlords in North East Wales, covering the local authority areas of Conwy County Borough, Denbighshire, and Flintshire. The overall aim of SARTH is to provide a common access route to a range of affordable housing options which is transparent, legal, efficient and accessible to all sections of the community. Through a common allocation framework partners share one register and so an applicant need make only one application to access the whole system. Each partner with properties in an area chosen by an applicant will be aware of the application and able to give the applicant the appropriate priority in the allocation process.

- 46 The Council has already developed and begun establishing a number of alternative forms of service delivery including partnership services with the private sector and shared services with other local councils and the third sector, such as local housing associations. For example, in April 2015 the Council implemented the transfer of Revenues and Benefits staff to a new partnership with the private company CIVICA. The Council develops revised service delivery models on a service-by-service basis, where business cases can be established, rather than being part of a systematic review of options of alternative means of service delivery.
- 47 Some Denbighshire services, however, such as Leisure Services, demonstrate that at a service level they already undertake robust systematic reviews of options of alternative means of service delivery. In our National Report on Leisure Services⁴ we reported how the Council, as part of its strategic aim that 'by 2020 Denbighshire will be renowned for high quality, accessible leisure opportunities attracting high levels of participation and improving the well-being of its residents and visitors', the Council held 14 stakeholder workshops, completed a detailed cost benefit analysis, including local market comparisons. This has provided the Council with detailed information about performance and customer satisfaction about each of its leisure facilities and has allowed it to develop detailed operational plans for individual facilities to deliver its aim of making services both self-funding and central in improving the health of residents living in Denbighshire.
- 48 Until December 2015, the Council did not have effective corporate mechanisms in place to monitor existing arrangements for alternative service delivery but has now agreed a corporate framework for alternative service providers. The framework sets out clearly requirements for having relevant guidance in place, the arrangements for considering and implementing changes, clarity of roles for those involved, the monitoring and governance arrangements, as well as the necessary legal components and the minimum levels of monitoring required depending on the value of services provided.
- 49 The new monitoring framework for alternative service delivery is yet to be fully implemented and current public scrutiny arrangements are weak. For example, the performance partnership with CIVICA for Revenues and Benefits, whilst subject to monthly review by a joint Board of CIVICA and the Council, an annual service challenge, and a report to a task and finish group, has not yet benefited from any public performance scrutiny by Members through either its scrutiny committees or the Corporate Governance Committee. However, the Council recognises the need to strengthen its public scrutiny and monitoring arrangements and is now implementing the new monitoring framework for alternative service providers.

4 **Delivering with less – Leisure Services**, December 2015.

Welsh Language Commissioner's evaluation of Denbighshire's performance

- 50 The role of the Welsh Language Commissioner (the Commissioner) was created by the Welsh Language (Wales) Measure 2011. New powers to impose standards on organisations came into force through subordinate legislation on 31 March 2015. The Commissioner will continue to review Welsh language schemes by virtue of powers inherited under the Welsh Language Act 1993.
- 51 The Commissioner works with all councils in Wales to inspect and advise on the implementation of language schemes. It is the responsibility of councils to provide services to the public in Welsh in accordance with the commitments in their language schemes. Every Council is committed to providing an annual monitoring report to the Commissioner outlining its performance in implementing the language scheme. The Commissioner analyses every monitoring report, provides a formal response and collects further information as required.
- 52 The Commissioner included areas for improvement in their inspection reports and letters issued to the Council during the year. These are available on the [WLC website](#).

Use of resources

The Council has appropriate financial management arrangements but needs to strengthen its approach to income generation

53 On 27 November 2015, the Auditor General issued an Annual Audit Letter to the Council. The letter summarises the key messages arising from his statutory responsibilities under the Public Audit (Wales) Act 2004 as the Appointed Auditor and his reporting responsibilities under the Code of Audit Practice. The Auditor General issued an unqualified opinion on the Council's accounting statements confirming that they present a true and fair view of the Council's financial position and transactions. The Annual Audit Letter can be found in [Appendix 2](#) of this report.

The Council's future plans and arrangements to deliver savings are fit for purpose and are being effectively managed

- 54 Good financial management is essential for the effective stewardship of public money and the delivery of efficient public services. Good financial management:
- helps authorities take the right decisions for the short, medium and long term;
 - helps authorities deliver services to meet statutory obligations and the needs of local communities;
 - is essential for good corporate governance;
 - is about managing performance and achieving strategic objectives as much as it is about managing money;
 - underpins service quality and improvement;
 - is the basis of accountability to stakeholders for the stewardship and use of resources; and
 - is a key management discipline.
- 55 Financial resilience is achieved when an authority has robust systems and processes to effectively manage its financial risks and opportunities, and to secure a stable financial position.
- 56 There is an effective corporate framework for financial planning at the Council. Its overall vision and aims are clearly articulated through its Corporate Plan 2012-17 which details the seven improvement objectives the Council aims to achieve for its citizens. The Council has a robust mechanism in place for ensuring improvement objectives are linked to, and protected by, service plans and that budgets and financial plans are set in line with the delivery of these objectives. Progress is measured through the Council's performance monitoring framework and is reported each year through the Council's Annual Delivery Document.

- 57 There are a number of policies supporting the Council's financial planning arrangements, with responsibilities set out in respect of budget setting, monitoring and reporting. The Council has a Medium Term Financial Plan (MTFP) which is currently in the process of being updated. The 2014 version sets out how the remaining savings gap is to be addressed in 2015-16 and beyond.
- 58 The Council's approach to setting its revenue budget changed for the 2015-16 financial year. While previously the Council approach has been to reduce costs incrementally, for 2015-16, services were reviewed under a Freedoms and Flexibilities programme to achieve a target of £18 million savings over the next two years. This budget process focuses on what a service does and how much it costs, and attempts to analyse whether service provision is statutory, aligned to a corporate priority or discretionary.

The Council has effective controls in place to ensure its financial processes and management are robust, but needs to strengthen its approach to income generation

- 59 The Council's 2015-16 savings and efficiencies plans are being effectively managed and are likely to be achieved.
- 60 Efficiency savings plans had been developed for 2015-16 across all Council departments. The plans include clear descriptions of where savings would be made. Denbighshire's savings plan is specific, measurable, achievable, relevant and timely. The Council's 2015-16 Savings Plan takes appropriate and relevant account of the future financial pressures the Council faces. Assumptions made by the Council in identifying the shortfall were comprehensive and reasonable and were supported by robust data.
- 61 Each year the Council reviews its level of reserves and provisions in respect of both earmarked and general reserves, a process which has been incorporated into the budget setting processes and member workshops. There is an inconsistency between the strategy for reserves as set out in the MTFP 2014-18 and the approach to reserves taken in setting the budget for 2015-16. There is a need to address this disconnect to ensure the Council's approach is consistent and that its key policies and procedures align effectively.
- 62 The Council also does not currently have a formal policy on income generation/charging, neither do they have a register of the charges set by respective departments. Although some discussion around charging takes place during the budget-setting process, these are not consistent across services and need to be formalised to ensure the Council has a prudent and considered approach.

The Council has robust arrangements for reviewing and challenging financial performance and those responsible for managing financial performance are held to account

- 63 There is a robust framework for reviewing and challenging financial performance at the Council. The Council's new forecasting monitoring and reporting system, 'Collaborative Planning', is effective in ensuring a consistent approach to budgetary control across the Council. As we reported in our last AIR 'Collaborative Planning' ensures a more consistent approach to budgetary control across the Council by collating budgetary information onto an online system and reducing the need for the use of various spreadsheets within different service departments.
- 64 The Cabinet receives a monthly budget report. The report shows the projected outturn for the year (rather than the position at a particular point in time) compared to the original budget. The monthly reports contain details of any significant variation in spend coupled with corrective action.

Governance

The Council's scrutiny arrangements support sound decision making and it has adequate corporate processes for responding to reports and recommendations from external regulators

The Council's scrutiny arrangements support sound decision making, but there is a significant decline in member attendance at scrutiny meetings

- 65 Relationships between councillors and officers are constructive and are underpinned by appropriate training, guidance and role descriptions. Councillors conduct themselves appropriately and generally seek to be constructive in committee meetings, even when they disagree with each other. There have been very few breaches of the Members' Code of Conduct in Denbighshire in recent years. All councillors are expected to attend training in the Code of Conduct. Appropriately, councillors may only take part in Licensing and Planning Committee meetings after undertaking specific training. The Council aims to provide training and development based on needs and councillors are generally positive regarding the training provided.
- 66 The Council has adopted within its constitution and elsewhere an appropriate set of guidance setting out the expectations for key roles of scrutiny committees. It keeps this up to date and has, for example, produced a role description for the chair and members of the committees.
- 67 The Cabinet meets monthly whilst each of the three Scrutiny Committees are scheduled to meet every six weeks. Each committee has a well-defined forward work programme which takes into account items on the Cabinet forward plan and reviews this at each meeting. The Council has a clear focus of setting the work programme which takes into account:
- corporate priorities and delivery of the Corporate Plan;
 - budget savings and their impact on Denbighshire and its residents; and
 - other high priorities which scrutiny can influence and effect change.

There is a structured evaluation process enabling scrutiny committees to focus their activities on important issues such as progress on projects and reports on the Council's performance.

- 68 A proportion of the work of scrutiny committees takes the form of 'pre-decision scrutiny' whereby committees consider issues before they reach Cabinet for decisions to be taken. A number of task and finish groups, such as the 'Cutting the Cloth' task and finish group which considers efficiency savings take on this role. The use of pre-decision scrutiny helps to ensure that the decisions made take account of a broad range of political views and reduces the likelihood that that scrutiny would 'call in' Cabinet decisions, thereby maintaining the smooth flow of Council business.
- 69 The quality of papers presented to scrutiny is generally good. Furthermore, the extensive engagement of councillors through, for example, their involvement in budget workshops generally ensures that the recommendations included within committee papers are likely to command a broad level of support.
- 70 The level of challenge and quality of debate in scrutiny committee meetings varies. However, we have observed a number of meetings that included a robust and well-informed challenge to the staff or Cabinet members presenting the papers.
- 71 The Council has developed a Scrutiny Improvement Action Plan, the progress of which is regularly monitored. There are, nevertheless, some aspects of the scrutiny arrangements that, whilst strengthened, remain inconsistent such as the presentation of reports, which are at times are presented by the relevant Cabinet member, and on other occasions by the lead officer (whilst the Cabinet Member is present). This confuses lines of accountability and responsibility.
- 72 The Corporate Governance Committee is developing well and is systematic in assuring itself that recommendations in Internal Audit reports have been implemented. The relevant Cabinet members, rather than the officers, are held to account by the Corporate Governance Committee and the balance of contributions from the Cabinet member is appropriate.
- 73 The level of attendance at scrutiny meetings and at the Corporate Governance Committee has declined and the Council is trying to address this issue. Senior officers and elected Members we spoke to are concerned about this decline in attendance with some meetings we observed being barely quorate. Analysis of attendance levels shows that this decline in participation has been a growing problem over the last year. The Council has previously tried holding some scrutiny meetings at different times of the day but this did not improve attendance levels. The reasons for this decline remain unclear but the trend needs to be reversed if the required level of assurance about the Council's scrutiny arrangements is to be maintained.

The Council has adequate corporate processes for responding to reports and recommendations from external regulators

- 74 The Council has adequate corporate processes for responding to reports from the Auditor General for Wales, tracking implementation of recommendations and reporting this to meetings of the Council. In our 2015 AIR we proposed the Council should review its working practices against the recommendations in the Auditor General's 2014-15 five Local Government National Reports and implement improvements as necessary.
- 75 The Council discussed some of the individual reports at scrutiny committees and the Corporate Governance Committee and produced a comprehensive review and action plan for all the reports which was presented to the full Council in October 2015. The Council has not yet reported back to the appropriate committee on progress with the action plan.
- 76 Since the last AIR was published a further five National Reports with recommendations that may be relevant to the Council have been published. A list of recommendations contained in reports issued in 2015-16 can be found in [Appendix 3](#).

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.

Appendix 2 – Annual Audit Letter

Councillor Hugh Evans – Leader
Dr. Mohammed Mehmet – Chief Executive
Denbighshire County Council
County Hall
Wynnstay Road
Ruthin
Denbighshire
LL15 1YN

27 November 2015

Dear Councillor Evans and Dr Mehmet

Annual Audit Letter – Denbighshire County Council 2014-15

This letter summarises the key messages arising from the Auditor General for Wales' statutory responsibilities under the Public Audit (Wales) Act 2004 and reporting responsibilities under the Code of Audit Practice.

Denbighshire County Council complied with its responsibilities relating to financial reporting and use of resources

It is the Council's responsibility to:

- put systems of internal control in place to ensure the regularity and lawfulness of transactions and to ensure that its assets are secure;
- maintain proper accounting records;
- prepare a Statement of Accounts in accordance with relevant requirements; and
- establish and keep under review appropriate arrangements to secure economy, efficiency and effectiveness in its use of resources.

The Public Audit (Wales) Act 2004 requires the Auditor General for Wales to:

- provide an audit opinion on the accounting statements;
- review the Council's arrangements to secure economy, efficiency and effectiveness in its use of resources; and
- issue a certificate confirming the completion of the audit of the accounts.

Local authorities in Wales prepare their accounting statements in accordance with the requirements of the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom. This code is based on International Financial Reporting Standards. On 30 September 2015, the Auditor General for Wales issued an unqualified audit opinion on the accounting statements confirming that they present a true and fair view of the Council's financial position and transactions. This report is contained within the Statement of Accounts. The key matters arising from the accounts audit were reported to members of the Corporate Governance Committee in the Audit of Financial Statements report on 28 September 2015.

The Auditor General for Wales is satisfied that the Council has appropriate arrangements in place to secure economy, efficiency and effectiveness in its use of resources

The Auditor General for Wales' consideration of the Council's arrangements to secure economy, efficiency and effectiveness has been based on the audit work undertaken on the accounts as well as placing reliance on the work completed as part of the Improvement Assessment under the Local Government (Wales) Measure 2009. The AIR will highlight areas where the effectiveness of these arrangements has yet to be demonstrated or where improvements could be made.

The Auditor General for Wales issued a certificate confirming that the audit of the accounts has been completed on 30 September 2015.

Work to date on the certification of grant claims and returns has not identified significant issues that would impact on the 2015-16 accounts or key financial systems.

A more detailed report on grant certification work will follow in 2016 once this year's programme of certification work is complete.

The financial audit fee for 2014-15 is currently expected to be in line with the agreed fee set out in the Annual Audit Outline.

Yours sincerely

Derwyn Owen
For and on behalf of the Auditor General for Wales

Appendix 3 – National report recommendations 2015-16

Date of report	Title of review	Recommendation
April 2015	The financial resilience of councils in Wales	<p>R1 Councils should ensure that their corporate plan:</p> <ul style="list-style-type: none"> • is the core driver for the service plans and other supporting strategies including workforce, information technology and capital expenditure; • maintains at least a three to five year forward view and is aligned with the medium term financial plan and other supporting strategies; and • should clearly articulate the desired role of the council in five years - the model for delivering priority services and the infrastructure and resources needed to deliver future priorities within available finances.
		<p>R2 The medium term financial plan should identify the major financial risks and key assumptions and senior officers and councillors should subject them to effective scrutiny and challenge before adopting the plan.</p>
		<p>R3 Councils need to ensure that funding deficits are accurately projected and fully reconciled to detailed savings plans for each year over the life of the medium term financial plan.</p>
		<p>R4 Councils should review the adequacy of the financial assurance arrangements that underpin the delivery of annual savings plans, including the level of scrutiny and challenge provided by councillors.</p>
		<p>R5 Councils should ensure that they have a comprehensive reserves strategy that outlines the specific purpose of accumulated useable reserves as part of their Medium term Financial Plan.</p>
		<p>R6 Councils should develop corporate wide policies on income generation with a view to increasing revenue streams and relieving financial pressures.</p>
		<p>R7 Councils should:</p> <ul style="list-style-type: none"> • strengthen budget setting and monitoring arrangements to ensure financial resilience; and • review the coverage and effectiveness of their internal and external assurance financial systems and controls to ensure they are fit for purpose and provide early warning of weaknesses in key systems.
		<p>R8 Councils must review their finance teams and ensure that they have sufficient capacity and capability to meet future demands.</p>
		<p>R9 Council officers need to equip councillors with the knowledge and skills they need to deliver effective governance and challenge by extending training opportunities and producing high quality management information.</p>

Date of report	Title of review	Recommendation
June 2015	Achieving improvement in support to schools through regional education consortia – an early view	<p>R1 To clarify the nature and operation of consortia. We found there to be continuing uncertainty about some aspects of the nature of regional consortia and their present and future scope (paragraphs 2.2 to 2.20). We therefore recommend:</p> <ul style="list-style-type: none"> Local authorities should clarify whether consortia services are jointly provided or are commissioned services (services provided under joint-committee arrangements are jointly provided services and are not commissioned services).
		<p>R2 To focus on outcomes through medium-term planning. We found that the development of effective regional consortia was hindered by a focus on short-term actions and uncertainty about the future of consortia (paragraphs 2.33 to 2.36; 3.16 to 3.17). We therefore recommend:</p> <ul style="list-style-type: none"> As any possible local authority re-organisation will not be fully implemented until 2020, the Welsh Government and regional consortia should develop three-year plans for the further development, scope, and funding of regional consortia linked to appropriate strategic objectives.
		<p>R3 To develop more collaborative relationships for the school improvement system. The development of the National Model for Regional Working involved many school improvement partners but we found that this had not led to the development of sufficiently collaborative relationships (paragraphs 2.25 to 2.32). We therefore recommend:</p> <ul style="list-style-type: none"> Regional consortia should develop improved arrangements for sharing practice and supporting efficiency (for example, one consortium could take the lead on tackling an issue or have functional responsibility for the development of a policy). The Welsh Government, local authorities and regional consortia should recognise the interdependency of all partners fulfilling their school improvement roles and agree an approach to: <ul style="list-style-type: none"> information sharing and consultation about developments related to school improvement; developing collaborative relationships of shared accountability; and undertaking system wide reviews, and an alignment of the understanding and position of regional consortia across all Welsh Government relevant strategies.

Date of report	Title of review	Recommendation
June 2015	Achieving improvement in support to schools through regional education consortia – an early view	<p>R4 To build effective leadership and attract top talent. Regional consortia, local authorities and the Welsh Government have all found difficulties in recruiting to senior leadership for education and we found there had been limited action to address this (paragraphs 2.37 to 2.40). We therefore recommend:</p> <ul style="list-style-type: none"> • the Welsh Government and local authorities should collaborate to improve the attractiveness of education leadership roles to attract the most talented leaders for the school improvement system; and • local authorities should collaborate to support the professional development of senior leaders and to ensure appropriate performance management arrangements are in place for senior leaders. <p>R5 To improve the effectiveness of governance and management of regional consortia. Whilst continuing progress is being made, we found that regional consortia have not yet developed fully effective governance and financial management arrangements (paragraphs 3.2 to 3.36). We therefore recommend that local authorities and their regional consortia should:</p> <ul style="list-style-type: none"> • improve their use of self-evaluation of their performance and governance arrangements and use this to support business planning and their annual reviews of governance to inform their annual governance statements; • improve performance management including better business planning, use of clear and measurable performance measures, and the assessment of value for money; • make strategic risk management an integral part of their management arrangements and report regularly at joint committee or board level; • develop their financial management arrangements to ensure that budgeting, financial monitoring and reporting cover all relevant income and expenditure, including grants funding spent through local authorities; • develop joint scrutiny arrangements of the overall consortia as well as scrutiny of performance by individual authorities, which may involve establishment of a joint scrutiny committee or co-ordinated work by local authority scrutiny committees; • ensure the openness and transparency of consortia decision making and arrangements; • recognise and address any potential conflicts of interest; and where staff have more than one employer, regional consortia should ensure lines of accountability are clear and all staff are aware of the roles undertaken; and • develop robust communications strategies for engagement with all key stakeholders.

Date of report	Title of review	Recommendation
July 2015	<p>Review of Corporate Safeguarding Arrangements in Welsh Councils</p>	<p>R1 Improve corporate leadership and comply with Welsh Government policy on safeguarding through:</p> <ul style="list-style-type: none"> • the appointment of a senior lead officer who is accountable for safeguarding and protecting children and young people with corporate responsibilities for planning improvements; • the appointment of a lead member for safeguarding; and • regularly disseminating and updating information on these appointments to all staff and stakeholders. <p>R2 Ensure there is a corporate-wide policy on safeguarding covering all Council services to provide a clear strategic direction and clear lines of accountability across the Council.</p> <p>R3 Strengthen safe recruitment of staff and volunteers by:</p> <ul style="list-style-type: none"> • ensuring that Disclosure and Barring Service (DBS) checks and compliance with safe recruitment policies cover all services that come into contact with children; • creating an integrated corporate compliance system to record and monitor compliance levels on DBS checks; and • requiring safe recruitment practices amongst partners in the third sector and for volunteers who provide services commissioned and/or used by the Council which are underpinned by a contract or service level agreement. <p>R4 Ensure all relevant staff, members and partners understand their safeguarding responsibilities by:</p> <ul style="list-style-type: none"> • ensuring safeguarding training is mandated and coverage extended to all relevant Council service areas, and is included as standard on induction programmes; • creating a corporate-wide system to identify, track and monitor compliance on attending safeguarding training in all Council departments, elected members, schools, governors and volunteers; and • requiring relevant staff in partner organisations who are commissioned to work for the Council in delivering services to children and young people to undertake safeguarding training. <p>R5 In revising guidance, the Welsh Government should clarify its expectations of local authorities regarding the roles and responsibilities of the designated officer within education services, and the named person at senior management level responsible for promoting the safeguarding.</p>

Date of report	Title of review	Recommendation
July 2015	Review of Corporate Safeguarding Arrangements in Welsh Councils	R6 Improve accountability for corporate safeguarding by regularly reporting safeguarding issues and assurances to scrutiny committee(s) against a balanced and Council-wide set of performance information covering: <ul style="list-style-type: none"> • benchmarking and comparisons with others; • conclusions of internal and external audit/inspection reviews; • service-based performance data; • key personnel data such as safeguarding training, and DBS recruitment checks; and • the performance of contractors and commissioned services on compliance with Council safeguarding responsibilities.
		R7 Establish a rolling programme of internal audit reviews to undertake systems testing and compliance reviews on the Council's safeguarding practices.
		R8 Ensure the risks associated with safeguarding are considered at both a corporate and service level in developing and agreeing risk management plans across the Council.
October 2015	Supporting the Independence of Older People: Are Councils Doing Enough?	R1 Improve governance, accountability and corporate leadership on older people's issues through: <ul style="list-style-type: none"> • the appointment of a senior lead officer who is accountable for coordinating and leading the Council's work on older people's services; • realigning the work of the older people's strategy coordinators to support development and delivery of plans for services that contribute to the independence of older people; • the appointment of a member champion for older people's services; and • regularly disseminating and updating information on these appointments to all staff and stakeholders.
		R2 Improve strategic planning and better coordinate activity for services to older people by: <ul style="list-style-type: none"> • ensuring comprehensive action plans are in place that cover the work of all relevant Council departments and the work of external stakeholders outside of health and social care; and • engaging with residents and partners in the development of plans, and in developing and agreeing priorities.
		R3 Improve engagement with, and dissemination of, information to older people by ensuring advice and information services are appropriately configured and meet the needs of the recipients.

Date of report	Title of review	Recommendation
October 2015	<p>Supporting the Independence of Older People: Are Councils Doing Enough?</p>	<p>R4 Ensure effective management of performance for the range of services that support older people to live independently by:</p> <ul style="list-style-type: none"> • setting appropriate measures to enable members, officers and the public to judge progress in delivering actions for all Council services; • ensuring performance information covers the work of all relevant agencies and especially those outside of health and social services; and • establishing measures to judge inputs, outputs and impact to be able to understand the effect of budget cuts and support oversight and scrutiny. <p>R5 Ensure compliance with the Public Sector Equality Duty when undertaking equality impact assessments by:</p> <ul style="list-style-type: none"> • setting out how changes to services or cuts in budgets will affect groups with protected characteristics; • quantifying the potential impact and the mitigation actions that will be delivered to reduce the potentially negative effect on groups with protected characteristics; • indicating the potential numbers who would be affected by the proposed changes or new policy by identifying the impact on those with protected characteristics; and • ensuring supporting activity such as surveys, focus groups and information campaigns includes sufficient information to enable service users to clearly understand the impact of proposed changes on them. <p>R6 Improve the management and impact of the Intermediate Care Fund by:</p> <ul style="list-style-type: none"> • setting a performance baseline at the start of projects to be able to judge the impact of these over time; • agreeing the format and coverage of monitoring reports to enable funded projects to be evaluated on a like-for-like basis against the criteria for the fund, to judge which are having the greatest positive impact and how many schemes have been mainstreamed into core funding; and • improving engagement with the full range of partners to ensure as wide a range of partners are encouraged to participate in future initiatives and programmes.

Date of report	Title of review	Recommendation
December 2015	Delivering with less – Leisure Services	<p>R1 Improve strategic planning in leisure services by:</p> <ul style="list-style-type: none"> • setting an agreed Council vision for leisure services; • agreeing priorities for leisure services; • focusing on the Council’s position within the wider community sport and leisure provision within the area; and • considering the potential to deliver services on a regional basis.
		<p>R2 Undertake an options appraisal to identify the most appropriate delivery model based on the Council’s agreed vision and priorities for leisure services which considers:</p> <ul style="list-style-type: none"> • the availability of capital and revenue financing in the next three-to-five years; • options to improve the commercial focus of leisure services; • opportunities to improve income generation and reduce Council ‘subsidy’; • a cost-benefit analysis of all the options available to deliver leisure services in the future; • the contribution of leisure services to the Council’s wider public health role; • better engagement with the public to ensure the views and needs of users and potential users are clearly identified; • the impact of different options on groups with protected characteristics under the public sector equality duty; and • the sustainability of service provision in the future.
		<p>R3 Ensure effective management of performance of leisure services by establishing a suite of measures to allow officers, members and citizens to judge inputs, outputs and impact. This should cover Council-wide and facility specific performance and include:</p> <ul style="list-style-type: none"> • capital and revenue expenditure; • income; • Council ‘subsidy’; • quality of facilities and the service provided; • customer satisfaction; • success of ‘new commercial’ initiatives; • usage data – numbers using services/facilities, time of usage, etc; and • impact of leisure in addressing public health priorities.
		<p>R4 Improve governance, accountability and corporate leadership on leisure services by:</p> <ul style="list-style-type: none"> • regularly reporting performance to scrutiny committee(s); • providing elected members with comprehensive information to facilitate robust decision-making; • benchmarking and comparing performance with others; and • using the findings of internal and external audit/inspection reviews to identify opportunities to improve services.

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