Cyngor Sir CEREDIGION County Council

REPORT TO:	**Governance and Audit Committee**
DATE:	**19 January 2022**
LOCATION:	Remotely by Video Conference
TITLE:	Ceredigion County Council Responses to Regulator & Inspectorate Reports
PURPOSE OF REPORT:	To provide the Governance and Audit Committee with the Council's responses to Regulator and Inspectorate Reports
For:	Decision
Cabinet Portfolio and Cabinet Member:	**Cllr Ray Quant MBE, Deputy Leader of the Council and Cabinet Member for Legal and Governance, People and Organisation, and Democratic Services**

Introduction

This Report sets out the Council's responses regarding Regulator and Inspectorate Reports and progress made regarding proposals and recommendations.

This Report has 2 parts:
a) Council tracker of Regulator/Inspectorate proposals for improvement and recommendations; and
b) Other Council related matters.

Current Position

a) Council tracker of Regulator/Inspectorate proposals for improvement and recommendations
- o Council Management Response Forms 2019-2020, 2020-2021 Update:
    - Excel Spreadsheet of MRF Responses (**Appendix 1**)
        - Updated MRF – Rough Sleeping in Wales Everyone's Problem; No-one's Responsibility (**Appendix 2)**
        - MRF - The National Fraud Initiative in Wales 2018-21 (**Appendix 3**)
- o Council Management Response Forms 2021-2022 Update:
    - Audit Wales Recommendations Monitoring Spreadsheet 2021-2022 (**Appendix 4**)
        - MRF for Regenerating Town Centres National Report (**Appendix 5**)

b) Other Council related matters
- o Response to:
    - Climate Change Decarbonisation Baseline Review (call for evidence)

- Care Home Commissioning for Older People Report (National Report) (Verbal response from Service)

RECOMMENDATIONS: To consider the Council's responses to Regulator and Inspectorate Reports

Reasons for Recommendation To keep the Governance and Audit Committee informed of reports, proposals and work being undertaken

Appendices:
Appendix 1 - Excel Spreadsheet of MRF Responses 2019-20, 2020-21
Appendix 2 – Updated MRF – Rough Sleeping in Wales Everyone's Problem; No-one's Responsibility
Appendix 3 – Updated MRF - The National Fraud Initiative in Wales 2018-21
Appendix 4 – Excel Spreadsheet of MRF Responses 2021-2022
Appendix 5 - MRF for Regenerating Town Centres National Report

Contact Name: Elin Prysor
Designation: Corporate Lead Officer: Legal & Governance & Monitoring Officer
Date of Report: 23/12/2021

Report title: The Effectiveness of Local Planning Authorities in Wales
Issue date: 06 June 2019
Audit Committee: 17 July 2019
Doc ref: https://audit.wales/sites/default/files/planning-services-2019-full-report-english_5.pdf

Report Summary
The planning system controls the use of land and what is built on it, and is enforced by planning authorities, which are responsible for deciding whether a proposed development should be allowed to go ahead by granting or refusing planning permission. Planning applications must be decided in line with the Local Development Plan1 unless there is a very good reason not to do so. Planning therefore ensures that the right development happens in the right place at the right time.

Recommendations

Ref	Proposal for Improvement / Recommendation	Council's response
R1	Part 1 of the report sets out the complexities of the planning system showing how challenging it is for local planning authorities to effectively engage with and involve stakeholders in choices and decisions. To improve involvement with stakeholders and ownership of decisions we recommend that: • local planning authorities: – test current engagement and involvement practices and consider the full range of other options available to ensure involvement activities are fit for purpose; – use 'Place Plans' as a vehicle to engage and involve communities and citizens in planning choices and decision making; and – improve transparency and accountability by holding planning meetings at appropriate times, rotating meetings to take place in areas which are subject to proposed development, webcasting meetings and providing opportunities for stakeholders to address committee meetings. • Welsh Government: – review the Development Management Procedure Order 2012 and update the engagement and involvement standards for local planning authorities.	The Council engages and consults with a wide range of stakeholders during the plan preparation and when planning applications are received. The Council is also working with Town and Community Councils to prepare Place Plans. The Council will: i) Review consultation methods and consider whether improvements can be implemented. ii) To continue to support the preparation of Place Plans iii) To consider opportunities to introduce webcasting of Development Control Committee meetings (subject to proposals to improve equipment to allow wider webcasting of meetings).
R2	Part 2 of the report highlights that local planning authorities have been subject to significant reductions in funding and struggle to deliver their statutory responsibilities. To improve resilience, we recommend that local planning authorities: • review their building control fee regimes to ensure the levels set, better reflect the actual cost of providing these services and make the service self-funding; and • improve capacity by working regionally to: – integrate services to address specialism gaps; – develop joint supplementary planning guidance; and – develop future local development plans regionally and in partnership with other local planning authorities.	The Council managed to maintain resources to support the Development Management, Planning Policy and Building Control teams. To ensure budgets are used efficiently as possible the Council will: i) Review the structure of the service of the service during 2019/20 ii) Review budget regimes for 2020/21 iii) Identify opportunities to work in partnership with other authorities to prepare planning policy and undertake specialist areas of planning.
R3	Part 2 of the report highlights that the cost of development control services is not reflected in the charges set for these services and progress in developing regional responses to strengthen resilience has been slow. We recommend that the Welsh Government: • reviews development control fees to ensure the levels set, better reflect the actual cost of providing these services; and • consider how to use the powers in the Planning (Wales) Act to support and improve local planning authority capacity and resilience.	Although a recommendation for Welsh Government to respond to, the Council would welcome fee increases and additional resources to support improvements to its planning services.
R4	Part 3 of the report summarises the effectiveness and impact of local planning authorities decision making and how well they are Page 9 of 9 - WAO National Report Summary and Proposals for Improvement Ref Proposal for Improvement / Recommendation Council Response performing against national measures. We recommend that local planning authorities improve the effectiveness of planning committees by: • reviewing their scheme of delegation to ensure planning committees are focussed on the most important strategic issues relevant to their authority; • revising reporting templates to ensure they are clear and unambiguous to help guide decision making and reduce the level of officer recommendations overturned; and • enforcing the local planning authorities' standards of conduct for meetings	The Council will continue to monitor performance of its decision making and consider: i) Further changes to the scheme of delegation ii) Standardising report templates for Committee iii) Review guidance available to Members and to members of the public regarding the decision making process.
R5	Part 4 of the report identifies the central role of planning to delivering the ambitions of the Wellbeing of Future Generations Act. We recommend that local planning authorities: • set a clear ambitious vision that shows how planning contributes to improving wellbeing; • provide planning committee members with regular and appropriate wellbeing training and support to help deliver their wider responsibilities; • set appropriate measures for their administration of the planning system and the impact of their planning decisions on wellbeing; and • annually publish these performance measures to judge planning authorities impact on wellbeing.	The Council is currently reviewing its Local Development Plan (LDP) and this document will explain the role of the plan and decision making will have towards delivering the ambitions of the Wellbeing and Future Generations Act. In addition, the Council will: i) Continue to hold briefing sessions with members about plans and the contribution makes towards the W&FG Act ii) Monitor the LDP and decision making iii) Publish annual monitoring and performance reports

Report title: Rough Sleeping in Wales - Everyone's Problem; No One's Responsibility
Issue date: July 2020
Audit committee:
Doc ref: https://www.audit.wales/sites/default/files/2020-11/Rough-sleeping-Eng_0.pdf

Report Summary
On behalf of the Auditor General for Wales, we have examined how public bodies are responding to and addressing wicked issues using people sleeping rough as a tracer. Overall, we have concluded that responding to COVID-19 is an opportunity for public bodies to start addressing long standing weaknesses in partnership working which has stopped them from tackling rough sleeping in the past.

Recommendations

Ref	Proposal for Improvement / Recommendation	Council's reponse
R1	Public bodies and third sector partners should ensure they use data to plan the right future services, and to put in place effective data sharing protocols to ensure they respond effectively and safely to people sleeping rough. We recommend that councils and their partners: • invest in data analytical skills to better understand the current situation and predict future demand to prevent future homelessness; • review and update data sharing protocols to ensure they support services to deliver their data sharing responsibilities effectively; and • introduce a single data capture and risk assessment process for to help support safe decisions making in dealing with people sleeping rough.	The LA have implemented an Assertive Outreach approach to meet this requirement and bring these identified clients into and through Housing Options Services. It is also looking at differing housing models to ensure clients don't return to streets and progress onto suitable housing. Housing First is one initiative that has been developed and being enhanced. This involves a multi-agency approach to ensure positive outcomes and prevent further crisis. The LA work closely with the support services, who provide both the management and support functions are our Temporary Accommodation and therefore lines of communication are in place, as well as sharing protocols.
R2	Because public bodies are responding to people in crisis, they often deal with acute issues in isolation and rarely address the fundamental cause of the crisis. To do this requires public bodies to design and create service delivery models that are responsive. We recommend that public bodies use our complex needs self-reflection tool to improve how they can jointly address complex needs in the future	As part of the LA response to Covid19 and utilising Phase 2 funding by Welsh Government, Ceredigion will be transforming its Temporary Accommodation portfolio to encompass a 'Triage' facility at the point of access. This will ensure the prompt needs assessments are undertake, with Rapid Re-housing at the forefront. Housing Support Grant while also enable this initiative to develop further with the implementation of 'Critical Time Interventions' role in partnership with 3rd Sector Partners, with timely intervention and prevention work underpinning this approach.

Report Title: The 'Front Door' to Adult Social Care
Issue Date: September 2019
Audit Committee: 05 February 2020
Doc ref: https://www.audit.wales/sites/default/files/Front-door-to-adult-social-care-english_11.pdf

Report Summary

The focus of our work has been to judge the effectiveness of this new 'front door' to social care, looking specifically at services for adults. Our review has considered the comprehensiveness of IAA services, the availability of preventative and community-based support, and the assurance systems put in place to ensure those who need care and support or are at risk are identified and assisted. Finally, we consider the impact of the front door on demand for social care (expenditure, assessments and services) but also in respect of improving wellbeing The report concludes that Councils are preventing social-care demand, but information, advice and assistance are not consistently effective

Recommendations

Ref	Proposal for Improvement / Recommendation	Council's response
R1	Part 1 of the report sets out how authorities promote access to the 'front door' and provide information, advice and assistance to help people to improve their wellbeing and prevent their needs from deteriorating. To improve awareness of the front door we recommend that: **local authorities** • review their current approaches, consider their audience, and ensure that good-quality information is made available in a timely manner to avoid needs deteriorating and people presenting for assistance in 'crisis'; • work in partnership with public and third-sector partners to help ensure people accessing via partner referrals, or other avenues, are given the best information to help them; • ensure that advocacy services are commissioned and proactively offered to those who need them at first point of contact; • to take local ownership and lead on the co-ordination and editing of local information published on Dewis Cymru locally. **The Welsh Government:** • Improve carers' awareness and understanding of their rights to be assessed for their own care and support needs, aimed at generating demand for local authorities' preventative services; and • Undertake a full evaluation of the role of Dewis Cymru in the wider implementation of the Act and use the data gained to build on its potential as a national information sharing portal.	Ceredigion County Council are implementing a transformation programme across a range of services including social care. The Council front of house, Clic, will act as the first point of contact for all enquiries to the authority collecting a minimum data set dependent upon type of enquiry. They will provide information for enquirers where possible signposting to digital data services such as DEWIS where appropriate, and where further assistance and advice is needed correctly direct enquiries to Porth Cymorth Cynnar (Early Help and Prevention services) and Porth Gofal (Social care integrated assessment and targeted Short Term services). Safeguarding concerns are escalated in a timely manner to the right department and make referrals directly to Porth Cynnal (specialist services), e.g. DoLS, MCA. Porth Gofal services will act as gatekeeper for all enquiries coming from Clic and will triage all cases, including the gathering of additional information where required. They will provide Information or Advice where required and if appropriate close the enquiry. For the remainder, provide Assistance that may lead a proportionate assessment; then either assign to a relevant service or close if no further action or Information/Advice can be provided. Ceredigion have been the regional pilot site for the roll out of an Independent Professional advocacy project which has been evaluated and being rolled out across the region.
R2	In Part 2 of the report we review arrangements for PSB scrutiny and conclude that there are shortcomings and weaknesses in current performance and practice. To improve scrutiny, we recommend that: **local authorities:** • map the availability of preventative services in their area to better understand current levels of provision and identify gaps and duplication; • involve third-sector partners in co-producing preventative solutions to meet people's needs and ensure people have equitable access to these services; • work with third-sector partners to tailor and commission new services where gaps are identified; and • work with partners to improve data to evaluate the impact of preventative services on individuals and the population more generally. **Welsh Government** • improve the cost evaluation in relation to the impact of the Act in a national context, and support local authorities to ensure that the desired impact of prevention on overall social-care expenditure becomes a demonstratable reality."	Dewis Cymru Working Group established to provide support and encourage services to upload and maintain their resources on the national platform. Collaborative working between our team of Community Connectors and our CVC to regular update and maintain a directory of local services, especially new COVID-19 response groups and organisations. A Local Resource Map (virtual) has been created in partnership CAVO which links with Dewis and Info-engine. Internal mapping of local third sector services providers available through a targeted focus group, contributing to the Local Authority's Transformation Programme of Social Care Services. This involved an internal mapping exercise of all known groups, networks and forums to identify what services/provision/opportunities are in place and where and also to identify what services need to be developed within the County (to support the development of our TAW programme) A number of grant schemes are jointly managed / distributed by Local Authority and CVC (CAVO). PSB Subgroup; Understanding our Communities is chaired by CVC CEO. A number of consultation responses have been completed jointly with third sector groups to ensure views are represented, for example the recent consultation on the National Plan for Carers and a Strategy for an Ageing Society. Work plans include the contribution of third sector partners through contracts and SLAs, including the Children and Communities Grant, namely Families First which includes a number of direct third sector providers. The Local Authority work very closely with third-sector partners and this partnership has grown and developed during the last 12 months. At the beginning of the pandemic last year CCC and CAVO created a list of all local resources (meal deliveries, shopping and medication collection, new and established COVID-19 support groups and national organisations) based on geographical areas in response to the pandemic. Both CCC and CAVO worked in collaboration to ensure that we responded effectively to emerging needs during these challenging times, by arranging food deliveries, pharmacy deliveries etc. to the residents of Ceredigion. A recent example of work with third-sector partners to tailor and commission new services where gaps are identified include a recent 'digital connectivity' project conducted in partnership between Flying Start, Families First, CAVO and Digital Communities Wales. This is a commissioned project based on identified need during the pandemic, whereby support is required for vulnerable families of children under 4 to be supported and equipped with connectivity to access support, namely virtual parenting groups programmes. Another example includes collaboration between the Local Authority, Hywel Dda Health Board and CVC (lead) in implementing the Welsh Government's Volunteer Recovery Grant. A joint work plan was submitted and now implemented. A number of focus areas are based on clear identified need, namely a commissioned project to research the impact of volunteers on wellbeing hubs, which will contribute in supporting the development of local wellbeing hubs. Social Care transformation programmes enable us to work with parents to improve data to evaluate the impact of preventative services on individuals and the population generally, for example our team of community connectors and our regional partners have benefitted from social prescribing training to strengthen our data collection opportunities to build strong, accountable services. A new perinatal mental health project funded by the Integrated Care Fund has enabled us to work with our Health colleagues to develop the evaluation of early intervention support for new or expecting parents in key locations in Ceredigion, and how the intervention has supported, has it reduced the need for specialist mental health support etc

Report title: Well-being of Future Generations: An examination of the design and implementation of the Council's Integrated Services Model – Ceredigion County Council
Issue date: 20 December 2019
Audit Committee: 5 February 2020
Doc ref: https://www.audit.wales/sites/default/files/2020-12/ceredigion_council_wfg_integrated_services_model_english.pdf

Report Summary
We examined the extent to which the Council is acting in accordance with the sustainable development principle in the design and implementation of the Integrated Services Model. In order to act in accordance with the sustainable development principle public bodies must take account of the following 'ways of working': Long term, prevention, integration, collaboration and involvement. Our examination found that the Council is effectively considering and applying the sustainable development principle in designing and implementing the Integrated Services Model and is pursuing opportunities to further embed the five ways of working.

Council's response	
Opportunities	**Council's actions**
Long term: • Further analysis of the funding, estimated costs and savings will assist in providing further clarity around the financial and operational sustainability of the Integrated Services Model. • The Council has undertaken detailed data analysis to help it design the Integrated Services Model but needs to develop measures to help it assure itself that it is making progress towards its longer term and prevention goals.	The implementation of the integrated services was delayed for some months as a result of the COVID 19 pandemic. The programme was re-established in August 2020 and relaunched as the Through Age & Wellbeing Programme. A range of priority work streams have been established these included work streams that will focus on financial management to ensure that future services are developed delivered and in a financially resilient way. The development of the Through Age and Wellbeing Strategy is progressing well. The Strategy will outline the delivery of the Through Age and Wellbeing vision from 2021-2027. The strategy will include 5 key strategic objectives and will be underpinned by an action plan that will clearly outline what is required to address the objectives and identified areas of need. These priorities will inform business planning and progress on the changes required across the programme and ensure that local assessment of performance on a quarterly basis through the Council quarterly performance arrangements.
Integration: • Undertake a full Equality Impact Assessment to examine how 'due regard' has been given to the 'implementation of a new practice': – impacts on the ability of the Council to meet the General Equality Duty; – supports, and is compatible with, the European Convention on Human Rights Article 8 protects the right to a private family life which includes matters of autonomy and self-determination as well as the privacy and confidentiality of personal documents and correspondence; and – meets the Welsh Language Standard. • Undertake a full Privacy Impact Assessment Required under GDPR where processing is planned which could have a significant impact on 'the rights and freedoms of individuals. Includes development of a new or enhanced system, processes or activities which involve personal data.	Corporate Managers have now been appointed and the completion of a full EIA has commenced this will be further progressed once the Through Age & Wellbeing Strategy has been finalised and agreed. The full PIA will also be progressed once the Through Age & Wellbeing Strategy has been finalised and it is clear the business processes required
Involvement: • The Council has the opportunity to involve the public in the later stages of model design to help them shape delivery portals. • The Council could use the outcome of its EIA to ensure it has involved all relevant diverse sections of service users in service design including those in hard to reach groups.	A comprehensive public engagement exercise undertaken six months after the implementation of the new structure. This will be captured as part of the engagement exercise.

Report title: Review of Public Services Boards
Issue date: October 2019
Audit Committee: 5 February 2020
Doc ref: https://www.audit.wales/sites/default/files/review-of-public-service-boards-english_11.pdf

Report Summary
On behalf of the Auditor General for Wales, we have examined how PSBs are operating; looking at their membership, terms of reference, frequency and focus of meetings, alignment with other partnerships, resources and scrutiny arrangements.

Recommendations

Ref	Proposal for Improvement / Recommendation	Council's reponse
R1	In Part 1 of the report we set out that understanding the impact of choices and decisions requires public bodies to fully involve citizens and stakeholders and undertake comprehensive Impact Assessments. However, we found that current practice is insufficient to provide assurance that the needs of people with protected characteristics are fully considered when reviewing choices and the voice of citizens is not sufficiently influencing decisions. We recommend that PSBs: • conduct formal assessments to identify the potential impact on people with protected characteristics and the Welsh language and review agreed actions to ensure any adverse impacts are addressed; • improve transparency and accountability by making PSB meetings, agendas, papers and minutes accessible and available to the public; • strengthen involvement by working to the guidance in the National Principles for Public Engagement in Wales; and • feed back the outcome of involvement activity identifying where changes are made as a result of the input of citizens and stakeholders.	It is felt that current practice is sufficient to provide assurance that the needs of people with protected characteristics are fully considered when reviewing choices and the voice of citizens is influencing decisions. All PSB agendas, papers and minutes are published on the Council's website and meetings are public (during the Covid pandemic members of the public can ask to listen in on the virtual meetings).
R2	In Part 2 of the report we review arrangements for PSB scrutiny and conclude that there are shortcomings and weaknesses in current performance and practice. To improve scrutiny, we recommend that: • PSBs and public bodies use the findings of the Auditor General for Wales' Discussion Paper: Six themes to help make scrutiny 'Fit for the Future' to review their current performance and identify where they need to strengthen oversight arrangements and activity; and • PSBs ensure scrutiny committees have adequate engagement with a wider range of relevant stakeholders who can help hold PSBs to account.	Although it is felt that Scrutiny arrangements are working well, steps have been taken to strengthen the process. There is a designated Ceredigion County Council Scrutiny Committee that receives reports following each PSB meeting. The Chair of the Scrutiny Committee is also invited to PSB meetings in order to feed-back and discuss the main points. In moving forward, the Chairs of each of the 6 PSB Project Groups will be invited to present a detailed report on their work at a future Scrutiny Committee.
R3	In Part 3 of the report we summarise the difficulty of developing, implementing and resourcing PSBs and the challenges of managing multiple partnerships that can often have overlap and duplication. To help build capacity, consistency and resourcing of activity we recommend that: • PSBs take the opportunity to discharge other plan and strategy obligations through the Local Wellbeing Plan; • the Welsh Government enables PSBs to develop flexible models of working including: – merging, reducing and integrating their work with other forums such as Regional Partnership Boards; and – giving PSBs flexibility to receive, manage and spend grant monies subject to PSBs ensuring they have adequate safeguards and appropriate systems in place for management of funding; effective budget and grant programme controls; and public reporting, scrutiny and oversight systems to manage expenditure.	Opportunities to discharge other plans and projects through the delivery of the Local Wellbeing Plan are actively and continuously explored. An example of this is the linkages that have been made with the RPB to utilise some transformation funding to deliver PSB priorities.
R4	To help build capacity, consistency and resourcing of activity we recommend that the Welsh Government and Welsh Local Government Association in their review of strategic partnerships take account of, and explore, the findings of this review.	N/A

Report title: 'Raising Our Game' Tackling Fraud in Wales
Issue date: July 2020
Audit committee:
Doc ref: https://www.audit.wales/sites/default/files/2020-11/raising_our_game_tackling_fraud_in_wales_english.pdf

Report Summary
This report examines seven 'key themes' that all public bodies need to focus on in raising their game to tackle fraud more effectively: • leadership and culture; • risk management and control frameworks; • policies and training; • capacity and expertise; • tools and data; • collaboration; and • reporting and scrutiny.

Recommendations

Ref	Proposal for Improvement / Recommendation	Council's Response
R1	The Welsh Government should enhance its strategic leadership of counter-fraud across the public service in Wales, playing a coordinating role where it can, while recognising that individual bodies remain responsible for their own counter-fraud activities.	The Council would welcome a co-ordinating role by Welsh Government in this area, which would assist and support collaboration and consistency in working practices within Local Government.
R2	All public bodies should champion the importance of a good anti-fraud culture and actively promote its importance to give confidence to staff and members of the public that fraud is not tolerated.	• The Council has a comprehensive 'Strategy on Countering Fraud, Corruption and Bribery (to include Anti-Money Laundering)' which is due for its 3-yearly review in April 2021. Update presented to & endorsed by Governance & Audit Committee 3/6/21. Final approval by Council 17/6/21. Updated copy on Council website. • The public are able to report any suspected incidents of Council Tax Reduction Scheme fraud and/or Housing Benefit / DWP benefit fraud on-line by following the instructions on the Council's website. • As part of the Council's safeguarding arrangements, the website also has a page detailing how suspected financial abuse (which includes fraud/theft) against a vulnerable adult should be reported. • The Council undertakes the National Fraud Initiative exercise regularly in order to prevent and detect fraud via data matching. Notifications publicising this exercise to staff and the public are placed on the Council website and on Ceri. • Internal Audit use 'Activedata' software to undertake data analytic techniques within systems where appropriate eg during the processing of covid grants. • Zurich, the Council's insurer, is due to provide a training module on Ethics & Fraud to the Council's Corporate Workshop on 28 May 2021. Following this presentation, the slides are to be used as a basis for an e-learning module for all staff. IA currently discussing content & requirements with Learning & Development.
R3	All public bodies should undertake comprehensive fraud risk assessments, using appropriately skilled staff and considering national intelligence as well as organisation-specific intelligence.	• All Managers produce business plans which include their business risks – fraud can be input as a risk if deemed appropriate, with mitigating actions noted. • Fraud appears as a priority heading in the Internal Audit annual audit plan of work. This is supported by notifications from external bodies such as NAFN and CIPFA, as well as other Local Authorities via the Welsh Chief Auditor Groups and by undertaking internal risk assessments.
R4	Fraud risk assessments should be used as a live resource and integrated within the general risk management framework to ensure that these risks are appropriately managed and escalated as necessary.	All risks within business / service plans are assessed for impact & likelihood in accordance with the Council's Risk Management Framework. Any risks with a resultant score falling in the high or critical risk categories are escalated to the Corporate Risk Register which is monitored by Leadership Group and reported to Governance & Audit Committee.
R5	All public bodies need to have a comprehensive and up-to-date set of policies and procedures which together represent a cohesive strategy for identifying, managing and responding to fraud risks.	• The 'Strategy on Countering Fraud, Corruption and Bribery (to include Anti-Money Laundering)' covers the prevention, detection and investigation of fraud. • The Risk Management Framework provides a comprehensive process for identifying and mitigating all risks. • The 'Policy and Guidelines for Safeguarding Children & Adults at Risk' contains a referral process with supporting forms, if financial abuse is suspected. • The Council has a Whistleblowing Policy if staff wish to report a concern, which can be made anonymously. • All the above policies & procedures are supported by various training packages for staff.
R6	Staff working across the Welsh public sector should receive fraud awareness training as appropriate to their role in order to increase organisational effectiveness in preventing, detecting and responding to fraud.	• Enforcement Officers such as Trading Standards staff are qualified to conduct PACE interviews. • The Council's HR service arranges in-house training for staff who are designated 'investigating officers' for disciplinary matters. • Each service has a trained designated safeguarding officer to which allegations of abuse against vulnerable persons are reported. • Two members of internal audit staff hold a CIPFA Certificate in Investigative Practices (CCIP) & another is an Accredited Counter Fraud Technician (ACFTech). • Zurich is due to provide a training module on Ethics & Fraud to the Council's Corporate Workshop (all managers) on 28 May 2021. Following this presentation, the slides are to be used as a basis for an e-learning module for all staff. IA currently discussing content & requirements with Learning & Development.
R7	Cases where fraud is identified and successfully addressed should be publicised to re-enforce a robust message from the top that fraud will not be tolerated.	• Any enforcement work resulting in successful court cases are covered by the local press. • Internal audit counter-fraud work undertaken is reported to Governance & Audit Committee annually. • Any member of staff responsible for a risk on the corporate risk register, or an action in an audit report can be called to the Governance & Audit Committee to provide assurances that appropriate systems / actions are in place.
R8	All public bodies need to build sufficient capacity to ensure that counter-fraud work is resourced effectively, so that investigations are undertaken professionally and in a manner that results in successful sanctions against the perpetrators and the recovery of losses.	The Council does not have a dedicated fraud team, but investigations are undertaken by officers who are deemed appropriate to each case, as per their experience / qualifications (see point R6 above).
R9	All public bodies should have access to trained counter-fraud staff that meet recognised professional standards.	As per point R8 above.
R10	All public bodies should consider models adopted elsewhere in the UK relating to the pooling /sharing of resources in order to maximise the availability of appropriately skilled staff.	The North & Mid Wales Chief Auditor Group is currently in the process of resurrecting the Specialist Fraud Working Group, which will assist with support and consistency in internal audit fraud practices throughout member authorities.
R11	All public bodies need to develop and maintain dynamic and agile counter-fraud responses which maximise the likelihood of a successful enforcement action and re-enforces the tone from the top that the organisation does not tolerate fraud.	As per point R8 above.
R12	All public bodies should explore and embrace opportunities to innovate with data analytics in order to strengthen both the prevention and detection of fraud.	Internal Audit use 'Activedata' software to undertake data analytic techniques within systems where appropriate eg during the processing of covid grants.
R13	Public bodies should work together, under the Digital Economy Act and using developments in data analytics, to share data and information to help find and fight fraud.	The Council undertakes the National Fraud Initiative exercise regularly in order to prevent and detect fraud via data matching between own services and with other national public sector bodies.
R14	Public bodies need to collate information about losses and recoveries and share fraud intelligence with each other to establish a more accurate national picture, strengthen controls, and enhance monitoring and support targeted action.	The Council perceives this as a task appropriate to WG if it accepts the coordinating role of strategic leadership of counter-fraud across the public services in Wales (see point R1 above).
R15	Audit committees must become fully engaged with counter-fraud, providing support and direction, monitoring and holding officials to account.	• Internal audit counter-fraud work undertaken is reported to Governance & Audit Committee annually. • Any member of staff responsible for a risk on the corporate risk register, or an action in an audit report can be called to the Governance & Audit Committee to provide assurances that appropriate systems / actions are in place.

Report title: The National Fraud Initiative in Wales 2018-20
Issue date: October 2020
Audit Committee: 12 November 2020
Doc ref: https://www.audit.wales/sites/default/files/NFI_interactive_PDF_2018_20_eng_0_10.pdf

Report Summary

Whilst the majority of Welsh NFI participants display a strong commitment to counter fraud and the NFI, as reported in my recent report on counter-fraud arrangements across Wales, some bodies do not demonstrate a commitment to address fraud and do not ensure that sufficient, skilled staff resource is in place to investigate matches, prevent frauds and correct errors.

The COVID-19 pandemic has brought significant challenges across the public sector as bodies seek to deliver services for individuals, communities and businesses in an extremely difficult time. Since the start of the pandemic, the risk of fraud has increased as organisations become stretched and controls and governance are changing.

Recommendations	Council's response
All participants in the NFI exercise should ensure that they maximise the benefits of their participation. They should consider whether it is possible to work more efficiently on the NFI matches by reviewing the guidance section within the NFI secure web application.	The NFI exercise is co-ordinated by the Audit Manager. All reports are run in conjunction with IT & results are sent to the appropriate services for processing. Report matches are produced in order of risk & sample testing is undertaken based on the risk priority. All participants are encouraged to read the guidance & undertake the training within the NFI secure web application prior to each exercise.
Audit committees, or equivalent, and officers leading the NFI should review the NFI self-appraisal checklist. This will ensure they are fully informed of their organisation's planning and progress in the 2020-22 NFI exercise.	The NFI exercise is reported upon in the Corporate Manager – Internal Audit's annual Counter Fraud Report to Governance & Audit Committee. Plans were in hand to complete the self-assessment to report to Leadership Group and Governance & Audit Committee at the beginning of this financial year, but were put on hold due to the pandemic. This is now scheduled for October 2021 at the conclusion of the current exercise. Update: the self-assessment has been completed and will be reported to Governance & Audit Committee in January 2022.
Where local auditors have identified specific areas where improvements could be made, the public bodies should act on these as soon as possible.	See R1 above - the NFI exercise is co-ordinated by the Audit Manager. All reports are run in conjunction with IT & results are sent to the appropriate services for processing. All recommended matches are required to be completed by end of May; all matches to be finalised by end of September. Each service decides on the appropriate methodology for progressing their individual matches. Report closure is checked by the Audit Manager.

All participants should be aware of emerging fraud risks e.g. due to COVID-19, and take appropriate preventative and detective action.	• All Managers produce business plans which include their business risks – fraud can be input as a risk if deemed appropriate, with mitigating actions noted.
	• All risks within business / service plans are assessed for impact & likelihood in accordance with the Council's Risk Management Framework. Any risks with a resultant score falling in the high or critical risk categories are escalated to the Corporate Risk Register which is monitored by Leadership Group and reported to Governance & Audit Committee.
	• Counter Fraud appears as a priority heading in the Internal Audit annual audit plan of work. This is supported by:
	  • Monitoring and response to fraud alerts (NAFN, wider networks, peers, etc)
	  • Membership and active participation in professional networks and groups (Tisonline, KHub, etc)
	  • Council has a Strategy to Counter Fraud, Corruption and Bribery (to include Anti-Money Laundering)
	  • Internal audit (IA) offer advice to services on implementation of new systems and processes to ensure effective internal controls maintained
	  • Nominated Council Officers undertake various fraud training to maintain knowledge and expertise
	  • Covid-19 grant payments audited prior to payment (as easier to stop a payment than recover it)
	  • Key financial control audits added to audit plan, to check controls, governance & risks whilst staff working from home.

Report title: Commercialisation in Local Government
Issue date: October 2020
Audit Committee: 12 November 2020
Doc ref: https://audit.wales/sites/default/files/2020-11/Commercialisation-english.pdf

Report Summary
Given the challenges of pursuing commercialisation and the need to maximise reward and minimise risk, on behalf of the Auditor General for Wales, we have examined how councils are approaching commercial ventures. Overall, we have concluded that councils need to have the right culture, skills and systems to unlock the benefits and mitigate the risks of commercialisation.

Recommendations

Ref	Proposal for Improvement / Recommendation	Council's response
R1	Undertaking commercialisation requires councils to have enough capacity, the right skills and robust but agile systems to be in place. We recommend that councils use our self-evaluation tools to develop a strategy for the extent to which they want to pursue commercialisation.	The Council will await to see implications of GPOC. The Council wil also consider using the self-evaltaion tool in developing a strategy for the extent they wish to pursue commercialisation.

Report title: Welsh Community Care Information System
Issue date: October 2020
Audit Committee: 12 November 2020
Doc ref: https://audit.wales/sites/default/files/WCCIS-Eng_10.pdf

Report Summary
The Welsh Community Care Information System (WCCIS) is intended to enable health and social care staff to deliver more efficient and effective services using a single system and a shared electronic record. The arrangements for reporting the benefits from WCCIS roll-out have been the subject of discussion and review from the outset. Work is still ongoing to develop a suitable reporting framework.

Recommendations

Ref	Proposal for Improvement / Recommendation	Council's response
R1	We recommend that, before committing any further central funding, the Welsh Government works with the WCCIS National Programme Team, health boards, local authorities and the supplier to: • produce an updated business case that takes account of local, regional and national costs and sets out expectations for further roll-out of the system, its use over the remainder of the contract term, the development of national data standards and planning for any successor arrangements; • ensure the organisations involved have the necessary capacity to support implementation and are giving enough priority to the programme against a clearly agreed plan; and • pull together a clear national picture on feedback from front-line users about the performance and general functionality of the system.	Clear development plan between the Local Authority and Health on future development of the system. Regionally we are sharing data with our Health Board through the system and have worked in partnership to develop the system. Other Local Authority's in the region have yet to sign the deployment order, therefore we currently have had limited engagement. Regionally we are developing local plans on the development of national data standards and interoperability of all the systems within the region
R2	We recommend that the Welsh Government works with the National Programme Team to consider: • how the WCCIS contract might have been strengthened to support and incentivise delivery and manage risk; and • how relevant lessons can be applied to any successor contracting arrangements and wider public procurement.	Central resource of business design and development – plan once for all users, common data sets, common workflows All stakeholders must be committed to the product and give a clear timeline of implementation. This can only be achieved if all are part of the specification and procurement process

Report title: Progress in Implementing the Violence Against Women, Domestic Abuse and Sexual Violence Act
Issue date: 21 November 2019
Audit Committee: 05 February 2020
Doc ref: https://www.audit.wales/sites/default/files/VAWDASV_eng_11.pdf

Report Summary

On behalf of the Auditor General for Wales, we have examined how the new duties and responsibilities of the Act are being rolled out and delivered. Overall, we have concluded that victims and survivors of domestic abuse and sexual

Recommendations

Ref	Proposal for Improvement / Recommendation	Council's response
R1	Part 1 of the report highlights that despite public bodies having an increasing understanding of, and demand for, VAWDASV services, significant gaps remain and engagement with survivors and victims in reviewing and developing services is inconsistent. To address this, we recommend that needs assessment and mapping of service provision by public bodies are revisited and involvement widened and enhanced to include all relevant stakeholders to build a more accurate picture of current service provision and identify gaps.	The Mid and West Wales VAWDASV Partnership Board published its strategy Safer Lives Healthier Relationships VAWDASV Strategy in line with VAWDASV legislation in November 2018. The Strategy outlines key information on the prevalence and scale of domestic in the region and how the Partnership organisations will support anyone who is experiencing or has experienced domestic abuse, sexual violence or violence against women, hold perpetrators to account, ensure professionals have the tools and knowledge to act, increase awareness of the issue and how to access support and help children and young people to understand inequality in relationships and that abusive behaviour is always wrong. The Strategy was developed following large scale engagement and consultation with survivors, specialist service providers, generic service providers, commissioners, stakeholders and members of the Mid and West Wales Domestic Abuse, Sexual Violence and Violence against Women Strategic Group. Nine focus groups were held across the region with 56 survivors who have been involved in services. The Strategy was taken back to survivors for their views and comments as part of the consultation providing an opportunity for them to consider how their input had shaped and informed the draft document. A total of 8 focus groups were held across the region in addition to 1-2-1 interviews with a total of 56 survivors engaging in the consultation activity. The range of engagement activity provided an opportunity for stakeholders, commissioners, providers and survivors to directly contribute to the development of the strategy, identify what works, highlight gaps in current provision and opportunities for improvement. Participants were also provided with an opportunity to articulate their vision for the strategy and to identify priorities for action. Participants were highly engaged in providing observations of the current and future landscape and the information gathered during this process provided a broad spectrum of opinions which were reflected within the identified and approved strategic priorities. See published Strategy document: https://www.cysur.wales/regional-policies-procedures/ The Mid and West Wales VAWDASV Annual Delivery Plan is reviewed and developed to reflect the changing needs and priorities across MWW. It sets out the agreed regional and local actions and objectives to achieve the agreed strategic priorities. The Annual Delivery Plan for 20/21 set out work to be achieved to develop a Regional Communication and engagement framework. Through the VAWDASV Regional Working group a series of consultations have included work with independent consultants to map existing Regional and National best practice in relation to this area and the regional resource available to support this function. The intention is to develop a consistent and inclusive framework for communication and engagement of the communities across MWW and using this to shape and inform our work to improve responses to VAWDASV. In Ceredigion a call out to survivors has been made and the consultants are interviewing and gaining their views on how best to ensure feed into needs assessment and mapping of service provision by public bodies This work is due to report back to the regional VAWDASV regional team after Easter 2021. This work will help identify further gaps in service provision and inform the development of our Regional Framework that is included within the Annual Delivery Plan for 21/22. The work completed within the Commissioning Subgroup has also supported this in completing a more recent assessment of need and service provision across the region. This has resulted in our MWW Regional VAWDASV Commissioning Framework Document, published on the RSB website. This work has highlighted gaps in service delivery and options for innovative and preventative service development. This is included in the development of our consistent MWW VAWDASV Service Specification that is currently in first draft and work will commence around implementation within 2021-22.
R2	Part 1 of the report describes how victims and survivors of VAWDASV often find it difficult to navigate a fragmented system of service delivery. To support victims and survivors to access and use services we recommend that **public bodies**: • produce comprehensive and relevant information in a variety of media on the full range of services available to protect and support victims and survivors; and • create a joint pathway to access services and support for both victims and professionals and advertise access arrangements widely.	agencies' communications strategies and work is ongoing to produce a regional communication strategy that will ensure consistent regional messaging for VAWDASV and Equality. The regional communication Strategy will be informed and supported by evidence and resources. The relevant actions in the Delivery Plan are as follows; Establishment of a VAWDASV Engagement and Communication subgroup (to also support the work under Survivor Engagement) Review existing VAWDASV communication plans in the region Map available resources / evidence to inform approach of the regional Communication Strategy Develop a VAWDASV key dates calendar including supporting and promoting the Welsh Government Communication Campaign and the Live Fear Free Helpline. Design and deliver a regional awareness raising campaign for Coercive and Controlling Behaviour. Consideration for how learning from DHRs will be included within the Regional Communication strategy. Current communication methods used by the partner agencies are varied and broad and resources produced and promoted can be viewed on the CYSUR website https://www.cysur.wales/vawdasv/ A Regional Pathway to Support was published in April 2020 and it has been designed in partnership with the VAWDASV Specialist Providers across the region, to assist in assuring consistency and continuation of service availability and accessibility for citizens of the Mid and West Wales region. It can be seen with the following link; https://www.cysur.wales/media/42mh3kxm/mid-and-west-wales-vawdasv-regional-pathway-to-support.pdf
R3	Part 2 of the report notes that whilst it is important that organisations comply with relevant data protection legislation, they also need to share data with partners to better meet the needs of victims and survivors. We recommend that **authorities**: • ensure staff who are likely to come into contact with victims and survivors have appropriate VAWDASV training; • provide refresher training to service managers to ensure they know when and what data they can and cannot share; and • review and update data sharing protocols to ensure they support services to deliver their data sharing responsibilities.	Ceredigion local authority has ensured that staff who are likely to come into contact with victims and survivors of VAWDASV receive appropriate training in line with the National Training Framework (NTF) and this includes references to the importance of data sharing. We recognise the crucial role the local authority plays in the early identification of those experiencing VAWDASV and our rolling programme of Ask and Act training, (which commenced September 2019 in line with the Mid and West Wales delivery plan) ensures that public facing professionals have regular opportunities to attend. Following a brief pause in training due to Covid 19 related issues in early 2020, Ceredigion were the first local authority within Mid and West Wales to restart delivery of Ask and Act training online. The Learning and Development team continue to work closely with colleagues in the Safeguarding Team, the VAWDASV Regional Adviser for Mid and West Wales and local specialist domestic abuse services to ensure training delivery is fit for purpose and strengthens our joined up approach to targeted enquiry, referrals and consideration of the whole family and complex needs. Ask and Act training is co-delivered by a training officer from the local authority and an external trainer from a local domestic abuse charity. English and Welsh medium courses are available and every participant receives supporting information to take away e.g. how to respond sensitively to disclosures and contact information for domestic abuse services both locally and nationally. Following completion of Ask and Act courses, participants are given access to an online resource via an internal Microsoft team's page where they can view or download supporting information at any time. In addition to Ask and Act, a number of specialist training opportunities have been made available to staff such as stalking awareness training, honour based abuse and the 'Respect' training programme, organised by Welsh Government for front line professionals working with families experiencing VAWDASV to recognise and respond to perpetrators of abuse.
R4	Part 2 of the report highlights that while some good progress has been made with regional working, there are not always appropriate levers in place to support service transformation in line with VAWDASV legislation. To ensure the benefits of regionalisation are realised, we recommend that delivery agencies (local authorities, health bodies, the police, fire and rescue authorities and the third sector) review their approach to regional working to better integrate services and maximise the positive impact they can make on victims and survivors.	Within Mid and West Wales the governance structure surrounding the Regional VAWDASV strategy was reviewed in 2019 to support implementation and build momentum within the Regional Partnership. There are now two groups dedicated to VAWDASV; a Strategic Group and a Delivery Group. The Strategic Group agrees on high-level arrangements which are then implemented at Delivery Group level. Both groups consist of membership from Ceredigion CC and the three other Local Authorities, both Health Boards and Dyfed Powys Police, Mid and West Wales Fire Service, NPS and the OPCCalong with a number of other key agencies including specialised VAWDASV Organisations. There are also several multi-agency sub groups in line with the objectives within the regional delivery plan. The VAWDASV Strategic and Delivery groups are overseen by the Regional Safeguarding Board Executive. A Regional Advisor has been in post since 2019. This appointment along with the structural arrangements above provide significant leverage in supporting service transformation and integrated multi-agency regional approaches in line with VAWDASV legislation. The Regional Advisor monitors and reports on regional progress against the MWW strategy and delivery plans to Welsh Government, effectively discharging the responsibilities of relevant authorities under the Act. The Adviser provides regular reports to all the regional and local operational groups along with the delivery and strategic groups. Copies of the reporting to Welsh Government against the Annual Delivery Plan for 19/20 can be seen on the Cysur.org website.
R5	Part 3 of the report highlights that the complex and short-term funding mechanisms, lack of data and insufficient consultation with stakeholders, are not supporting sustainable commissioning of VAWDASV services. To address this, we recommend that local authorities review their commissioning arrangements to: • remove duplication and overlap between different approaches within the authority and with partners; • rationalise administration arrangements to improve efficiency and value for money; • streamline and standardise commissioning arrangements to reduce the burden of administration on all parties; and • set appropriate performance measures, targets and benchmarks to judge the impact and outcome of commissioned services.	The MWW Regional VAWDASV Partnership and Commissioning Subgroup has made significant progress towards streamlined and consistent Regional commissioning in response to VAWDASV, with consistent and informative monitoring. We have an established Commissioning Subgroup, chaired by Chris Harrison, with an agreed TOR and action plan. The Regional Commissioning Document has been published on the RSB website, following a robust assessment of current need and service provision. Highlighting service gaps and opportunities for innovation and development. Within 2020-21, the focus of the Commissioning Subgroup has been the development of a Regional Service Specification in respect of VAWDASV service delivery across Mid and West Wales. The Service Specification includes a Regional Outcomes framework that has been informed by a regional outcomes and data mapping exercise. This is now in it's first draft and the focus for 2021-22 will be implementation and identification of joint commissioning opportunities across the region. The focus for 2021-22 will be the implementation of the Service Specification across the Region. This will include reference to the gap analysis within the Regional Commissioning Document and allocation of resources.

AW National Report Summary and Proposals for Improvement

Regulatory Authority: Audit Wales

Report title: Rough Sleeping in Wales – Everyone's Problem; No One's Responsibility

Issue date: 23 July 2020

Audit Committee:

Document reference: https://www.audit.wales/sites/default/files/2020-11/Rough-sleeping-Eng_0.pdf

Report Summary
On behalf of the Auditor General for Wales, we have examined how public bodies are responding to and addressing wicked issues using people sleeping rough as a tracer. Overall, we have concluded that responding to COVID-19 is an opportunity for public bodies to start addressing long standing weaknesses in partnership working which has stopped them from tackling rough sleeping in the past.

Recommendations

Ref	Proposal for Improvement / Recommendation	Council Response
R1	Public bodies and third sector partners should ensure they use data to plan the right future services, and to put in place effective data sharing protocols to ensure they respond effectively and safely to people sleeping rough. We recommend that councils and their partners: • invest in data analytical skills to better understand the current situation and predict future demand to prevent future homelessness; • review and update data sharing protocols to ensure they support services to deliver their data sharing responsibilities effectively; and • introduce a single data capture and risk assessment process for to help support safe decisions making in dealing with people sleeping rough.	The LA have implemented an Assertive Outreach approach to meet this requirement and bring these identified clients into and through Housing Options Services. It is also looking at differing housing models to ensure clients don't return to streets and progress onto suitable housing. Housing First is one initiative that has been developed and being enhanced. This involves a multi-agency approach to ensure positive outcomes and prevent further crisis. The LA work closely with the support services, who provide both the management and support functions are our Temporary Accommodation and therefore lines of communication are in place, as well as sharing protocols.
R2	Because public bodies are responding to people in crisis, they often deal with acute issues in isolation and rarely address the fundamental cause of the crisis. To do this requires public bodies to design and create service delivery models that are responsive. We recommend that public bodies use our complex needs	As part of the LA response to Covid19 and utilising Phase 2 funding by Welsh Government, Ceredigion have transformed part of its Temporary Accommodation portfolio to encompass a 'Triage' facility at the point of

Ref	Proposal for Improvement / Recommendation	Council Response
	self-reflection tool to improve how they can jointly address complex needs in the future.	access. This will ensure the prompt needs assessments are undertake, with Rapid Re-housing at the forefront. Housing Support Grant has also enable this initiative to develop further with the implementation of 'Critical Time Interventions' role in partnership with 3rd Sector Partners, with timely intervention and prevention work underpinning this approach.

WAO National Report Summary and Proposals for Improvement

Regulatory Authority: Wales Audit Office

Report title: The National Fraud Initiative in Wales 2018-20

Issue date: 12th October 2020

Audit Committee: 12th November 2020

Document reference: https://www.audit.wales/sites/default/files/NFI_interactive_PDF_2018_20_eng_0_10.pdf

Report Summary
Whilst the majority of Welsh NFI participants display a strong commitment to counter fraud and the NFI, as reported in my recent report on counter-fraud arrangements across Wales, some bodies do not demonstrate a commitment to address fraud and do not ensure that sufficient, skilled staff resource is in place to investigate matches, prevent frauds and correct errors. The COVID-19 pandemic has brought significant challenges across the public sector as bodies seek to deliver services for individuals, communities and businesses in an extremely difficult time. Since the start of the pandemic, the risk of fraud has increased as organisations become stretched and controls and governance are changing

Recommendations

Ref	Proposal for Improvement / Recommendation	Council Response
R1	All participants in the NFI exercise should ensure that they maximise the benefits of their participation. They should consider whether it is possible to work more efficiently on the NFI matches by reviewing the guidance section within the NFI secure web application	The NFI exercise is co-ordinated by the Audit Manager. All reports are run in conjunction with IT & results are sent to the appropriate services for processing. Report matches are produced in order of risk & sample testing is undertaken based on the risk priority. All participants are encouraged to read the guidance & undertake the training within the NFI secure web application prior to each exercise.
R2	Governance & Audit committees, or equivalent, and officers leading the NFI should review the NFI self-appraisal checklist. This will ensure they are fully informed of their organisation's planning and progress in the 2020-22 NFI exercise.	• The NFI exercise is reported upon in the Corporate Manager – Internal Audit's annual Counter Fraud Report to Governance & Audit Committee. • Plans were in hand to complete the self-assessment to report to Leadership Group and Governance & Audit Committee at the beginning

Ref	Proposal for Improvement / Recommendation	Council Response
		of this financial year, but were put on stop due to the pandemic. This is now scheduled for October 2021 at the conclusion of the current exercise. • Update: the self-assessment has been completed and will be reported to Governance & Audit Committee in January 2022.
R3	Where local auditors have identified specific areas where improvements could be made, the public bodies should act on these as soon as possible.	See R1 above - the NFI exercise is co-ordinated by the Audit Manager. All reports are run in conjunction with IT & results are sent to the appropriate services for processing. All recommended matches are required to be completed by end of May; all matches to be finalised by end of September. Each service decides on the appropriate methodology for progressing their individual matches. Report closure is checked by the Audit Manager.
R4	All participants should be aware of emerging fraud risks e.g. due to COVID-19, and take appropriate preventative and detective action.	• All Managers produce business plans which include their business risks – fraud can be input as a risk if deemed appropriate, with mitigating actions noted. • All risks within business / service plans are assessed for impact & likelihood in accordance with the Council's Risk Management Framework. Any risks with a resultant score falling in the high or critical risk categories are escalated to the Corporate Risk Register which is monitored by Leadership Group and reported to Governance & Audit Committee. • Fraud appears as a priority heading in the Internal Audit annual audit plan of work. This is supported by:

Ref	Proposal for Improvement / Recommendation	Council Response
		• Monitoring and response to fraud alerts (NAFN, wider networks, peers, etc);
		• Membership and active participation in professional networks and groups (Tisonline, KHub, etc);
		• Council has a Strategy to Counter Fraud, Corruption and Bribery (to include Anti-Money Laundering);
		• Internal audit (IA) offer advice to services on implementation of new systems and processes to ensure effective internal controls maintained;
		• Nominated Council Officers undertake various fraud training to maintain knowledge and expertise;
		• Covid-19 grant payments audited prior to payment (as easier to stop a payment than recover it);
		• Key financial control audits added to audit plan, to check controls, governance & risks whilst staff working from home.

Report title: Review of planning services - Ceredigion County Council
Issue date: October 2021
GAC:
Doc Ref: https://www.audit.wales/sites/default/files/publications/ceredigion_council_planning_services_review_english.pdf

Report Summary

Our review sought to answer the question: Is the Planning Service effectively and sustainably meeting its objectives and contributing towards the achievement of the priorities in the Council's Corporate Strategy? Overall, we found that:
Whilst Council members and senior officers view the planning service as strategically critical, significant longstanding weaknesses in the Development Control Committee's governance arrangements are not sustainably or cohesively supporting the Council to improve performance and achieve its strategic objectives and priorities. We reached this conclusion because:
• whilst the planning service is improving its performance in the time taken to determine applications, longstanding weaknesses remain in relation to positive enforcement action and the high number of member decisions contrary to professional officer advice;
• planning staff are committed to their work with objectives linked to the Corporate Strategy, however, ongoing vacancies create challenges to effective and sustainable service delivery; and
• the governance arrangements of the Development Control Committee do not cohesively and sustainably support the delivery of the Council's key planning and strategic priorities.

Recommendations

Ref	Proposal for improvement / recommendation	Council's Response	Target Date	Responsible Officer
Governance		**Governance**		
R1	The Council should review its constitution to strengthen the governance of its development control arrangements. The review should: a) learn from the development control governance arrangements of other Local Planning Authorities (LPAs); b) develop an agreed Terms of Reference for the Council's Development Control Committee, to clearly state its purpose, role and responsibilities, and how it links to Corporate Priorities; c) define what it deems as strategically important and 'major' planning applications; d) strengthen the Development Control Committee's scheme of delegation by considering raising the threshold for planning applications called into Committee to allow it to better focus on more strategically important and major applications; e) ensure planning applications submitted by or on behalf of the Council's officers and members are considered by the Development Control Committee and not under officer delegated powers to safeguard against any perceived conflicts of interest and to promote independence and transparency; f) review the balance of time local ward members have to speak on planning applications at committee meetings as compared to applicants and objectors; and g) review and include the Council's Planning Code of Practice in the constitution and ensure members understand and act in accordance with it.	• The Council has established a Task and Finish Group (T&F group) to develop actions that will improve the Planning Service including decision making. • The T&F Group agreed an Action Plan on the 6th July that included a range of tasks. The Action Plan is regularly updated and was revised on the 10th November to include the Audit Wales Planning Report recommendations. • A review of the Constitution and current practice, taking into account arrangements in other authorities, is currently progressing. • A revised Terms of Reference has been drafted. This will be considered by the T&F Group on the 10th December and reported with other proposed changes to the Governance and Audit Committee in January. • Revisions to the Constitution have been drafted that propose amendments to the section on delegations. Draft proposals include automatically reporting: strategic and major applications; council own applications; Member and certain staff applications to Committee. These will initially be discussed by the T&F Group on the 10th December. • A paper has been drafted on the role and time allowed for local Ward Members to speak at Committee. This is to be considered by the T&F Group on the 10th December. • A revised Code of Practice and accompanying Operational Procedures has been drafted. This was initially considered by the T&F Group on the 30th November. Further revisions maybe necessary as other responses are agreed.	Mar-22	Russell Hughes-Pickering Task and Finish Group Support from: Development Management Planning Policy Legal & Governance Services Democratic Services
R2	The Council should ensure that its Development Control Committee and committee support arrangements comply with data protection principles and the processing of personal information in accordance with the Data Protection Act 20181 and the UK General Data Protection Regulation.	• Members will receive training on their obligations under the GDPR as part of the new member training and a section on said legislation is now included in the draft protocol for members in planning.	May /June 2022	Russell Hughes-Pickering Task and Finish Group Development Management Planning Policy Legal & Governance Services Democratic Services Customer Contact
R3	The Council's Development Control Committee members need to ensure that any planning decisions are based on sound material planning considerations, and not applicants' personal circumstances.	• The T&F Group agreed a 'cooling off' deferral process in July 2021. This was shared and agreed by the Development Control Committee on the 14th July 2021. • The process was first applied to cases considered at the Development Control Committee on the 28th July 2021. • Several cases have been considered and reported back since. • This process will be reviewed after six months so that more permanent arrangements can be put in place. • In addition to the cooling off deferral process The T&F Group agreed, on 26th October 2021, to resume a training programme for Members from January 2022. • It will initially focus on PPW and Future Wales; the Well Being and FG Act & Socio Economic Duty; Phosphates; and Case Law	May-22	Russell Hughes-Pickering Task and Finish Group Development Management Planning Policy Legal & Governance Services Democratic Services
R4	The Council needs to ensure that recordings of its 'in public' Development Control Committee meetings are made publicly available after committee meetings to adhere to the future requirements of the Local Government and Elections (Wales) Act 2021.	• In accordance with the requirements of the LGEW Act 2021, arrangements are being made to enable hybrid meetings to be held from May 2022. New equipment is currently being installed in the Chamber December 2021/January 2022. The system will allow meetings to be recorded and made available online.	Mar-22	Democratic Services Customer Contact
R5	The Council should ensure that Development Control Committee decisions relating to 'affordable' homes in the open countryside are made and reported accurately in accordance with the Council's Affordable Housing supplementary guidance.	• Additional information in relation to compliance with the Affordable Homes SPG has been added to a number of internal council monitoring systems and DC committee reports for AH properties will explicitly state whether the proposal is in-line with the AH SPG. • A review of all current and past AH approvals for AH will be undertaken and their status in accordance with compliance will be updated on the council's systems. • This will be reported to the T&F Group in January 2022.	Mar-22	Russell Hughes-Pickering Task and Finish Group Development Management Planning Policy Democratic Services
R6	The Council and Development Control Committee should assess the cumulative implications and long-term infrastructure impact of approving single affordable dwellings and TAN 6 planning applications in the open countryside to ensure they contribute sustainably and cohesively to the Council's wider corporate priorities.	• A response to this recommendation will look at affordable housing and TAN6 dwellings separately. TAN6 applications by their very definition will need to be located functionally close to the agricultural holding or dwelling. Policies also allow for affordable housing where they are in or adjacent to settlements. • Officer are developing a sustainability checklist for use by members at the Development Control Committee to assess the individual and cumulative impacts of decision making – this is being informed by PPW11, Dev Plans Man 3 and the WBFG Act and the corporate priorities of the council. The checklist will be pre-completed for members by planning officers and will form part of the agenda pack at DCC for decision making. • This will be reported to the T&F Group in January 2022.	Mar-22	Russell Hughes-Pickering Task and Finish Group Development Management Planning Policy Democratic Services
Service Planning - The Council's Planning Service should:		**Service Planning**		
R7	More clearly present its performance information and targets in its business plans.	• Business and Service Plans will be reviewed. • A Tender Brief has been drafted for appointing consultants to help clear planning application and enforcement backlogs. • This will help inform revised performances targets and measures.	Mar-22	Russell Hughes-Pickering Task and Finish Group Development Management Planning Policy
R8	Review the effectiveness and efficiency of combining the Development Management Officer and Enforcement roles including the impact on performance.	• This is to be reviewed when caseloads have been reduced.	Oct-22	Russell Hughes-Pickering Task and Finish Group Development Management
Monitoring		**Monitoring**		
R9	The Council should establish a framework to assure itself that the Development Control Committee contributes cohesively and sustainably to achieving the Council's corporate priorities.	• Decisions made contrary to officer advice and that do not fulfil the criteria of the checklist being developed under R6 will be annually reviewed as part of the AMR process and reported to the internal audit procedures.	Mar-22	Russell Hughes-Pickering Task and Finish Group Development Management Planning Policy Legal & Governance Democratic Services
Well-being of Future Generations		**Well-being of Future Generations**		
R10	In making any changes to the planning service, the Council should take the opportunity to consider how it might act more closely in accordance with the sustainable development principle in contributing to the delivery of the Council's well-being objectives when making planning decisions.	• To review PPW and other monitoring frameworks to identify ways to capture contributions to the delivery of well-being objectives. • To review how this can be made clearer in Committee reports. Currently reviewing other authority reports. • Briefings / training on the wellbeing and FG Act and sustainability.	Mar-22	Russell Hughes-Pickering Task and Finish Group Development Management Planning Policy Legal & Governance Democratic Services

Report

Financial Sustainability Assessment

Regenerating Town Centres in Wales

Review of planning services - Ceredigion County Council

Report title: Financial Sustainability Assessment
Issue date: June 2021
GAC:
Doc Ref: https://www.audit.wales/sites/default/files/publications/ceredigion_council_financial_sustainability_2021_eng.pdf

Report Summary
Our 2020-21 assessment on councils' financial sustainability was in two phases. Phase 1 was a baseline assessment of the initial impact of COVID-19 on local councils' financial position. Phase 1 drew on: the year-end position for 2019-20; the position at the end of quarter 1 for 2020-21; and projections for quarter 2 for 2020-21. Following Phase 1, in October 2020 we published a national summary report – Financial Sustainability of Local Government as a result of the COVID-19 Pandemic1. We found that councils and the Welsh Government have worked well together to mitigate the impact of the pandemic to date, but the future sustainability of the sector is an ongoing challenge.
The pandemic has had an immediate and profound effect on public sector finances as a whole and, as a consequence, on councils' financial position. The summary report set a high-level baseline position, including the reserves position of local councils before the pandemic. It also set out the initial financial implications of the pandemic for local councils and the scale of the anticipated challenge going forward.
This report concludes phase 2 of our financial sustainability assessment work during 2020-21. As part of this we are producing a local report for each of the 22 principal councils in Wales.
We undertook this assessment during January 2021 to March 2021.

Recommendations

Ref	Proposal for improvement / recommendation	Council's Response
P1	To ensure the Council meets its future financial challenges, the Council should: • continue to monitor the significant overspends in Social Care; and • ensure that the Social Services Transformation Project is driving improvement.	The Council accepts the Audit Wales proposal for improvement. Actions include:- 1. To continue with formal financial monitoring reports takes place with reporting to both Leadership Group and Cabinet; and 2. Action plans and work streams are being implemented and the Governance arrangements are in place to ensure that progress is made.

Report title: Regenerating Town Centres in Wales
Issue date: September 2021
GAC:
Doc Ref: https://www.audit.wales/sites/default/files/publications/town-centre-regeneration-eng.pdf

Report Summary
This report sets out the main findings from the Auditor General's review of how local authorities are managing and regenerating their town centres. The evidence base for our review is set out in Appendix 1. We have concluded that town centres are at the heart of Welsh life and can be vibrant and sustainable places, but addressing the many challenges they face requires brave decisions and ambitious leadership.

Recommendations

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R1	Non-domestic rates have not been reviewed in recent years, and the levels charged do not reflect the current rents being achieved in many town centres. We recommend that the Welsh Government review Non-domestic Rates to ensure the system better reflects town-centre conditions when the payments holiday ends in March 2022.	Recommendation for Welsh Government to consider. Welsh Government have announced reductions for 2022/23. Council would welcome further consideration for future years.
R2	Many town-centre businesses are impacted adversely by charging for car parking, access to public transport and poor transport infrastructure. We recommend that the Welsh Government work with local authorities to review transport challenges facing town centres and agree how best to address these.	The Council is part of the Regional Mid Wales Action Group that was formed by Welsh Government. The group has identified a range of issues including accessible to and within town centres and a draft Action Plan has been prepared to respond to challenges towns face. The Council continues to seek funding to improve public transport routes to its town centres and improve the infrastructure in towns to improve accessibiltiy within them.
R3	The Welsh Government has directly provided and levered in just under £900 million through 13 funding schemes to help regenerate town centres. However, some aspects of the Welsh Government's management of the funding are considered problematic. To ensure local authorities are able to maximise the impact of funding and tackle the more difficult and longstanding problems that would help transform their town centres, we recommend that the Welsh Government: • consolidate funding to reduce bureaucracy by streamlining processes and grant conditions and keeping requests for information and supporting materials to a minimum; • move away from annual bidding cycles to multi-year allocations; and • rebalance investment from capital to revenue to help local authorities address staff capacity and skills shortages.	Recommendation for Welsh Government to consider. However, agree with the recommendation that Welsh Government review their approach to funding regeneration of town centres. Tackling funding issues is part of the draft Regional Mid Wales Action Plan.
R4	The Welsh Government has provided all 22 local authorities with training on how best to use existing enforcement, financial assistance and debt recovery powers, but they are not being consistently nor effectively utilised to support regeneration. We recommend that local authorities take appropriate action, using these existing powers and resources available to achieve the best possible outcome for town centres by: • using alternative methods of enforcement before using Compulsory Purchase Orders as a last resort; • integrating enforcement strategies with wider departmental strategies across housing, environmental health, planning and regeneration teams to make more effective use of existing skills and resources; and • ensuring there is capacity and the right expertise to use the full range of powers, working in collaboration with other councils to achieve good outcomes.	The Council has a history of supporting the re-use of empty properties into residential use. However, it has relied on Welsh Government funding to do this. In response to the assistance provided by Welsh Government the Council has drafted an Empty Property Action Plan that will form the basis for tackling the issues identified and being more directly involved in bringing empty properties back in to use.
R5	The Welsh Government's 'Town Centres First' approach looks to put the health of town centres at the heart of the decisions taken by the Welsh Government, local authorities, the wider public sector, businesses and communities. This requires a high degree of integration between cross-cutting policy frameworks and decision making to promote town centres above much else. We recommend that the Welsh Government set out how it plans to deliver this in practice, its expectations of partners and the practical steps it will take to make this ambition a reality.	Recommendation for Welsh Government to consider.
R6	Town centres are changing, and local authorities need to be receptive to these changes and plan to manage these shifts. We recommend that local authorities use our regeneration tool to self-assess their current approaches to identify where they need to improve their work on town-centre regeneration.	The Council is working with other partners to respond to changes within town centres. The establishment of the Regional Mid Wales Action Group is a good starting point. The Council has been active in the preparation of the Action Plan, also more locally in the preparation of Place Plans and successful applications for funding to take projects forward that will help regenerate towns in the County.

AW National Report Summary and Proposals for Improvement

Regulatory Authority: Audit Wales

Report title: Regenerating Town Centres in Wales

Issue date: September 2021

Governance and Audit Committee:

Document reference: https://www.audit.wales/sites/default/files/publications/town-centre-regeneration-eng.pdf

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