

Annual Improvement Report – **Denbighshire County Council**

Audit year: 2018-19

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This Annual Improvement Report has been prepared on behalf of the Auditor General for Wales by Gwilym Bury, Charlotte Owen, and Jeremy Evans under the direction of Huw Rees

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We welcome correspondence and telephone calls in Welsh and English. Corresponding in Welsh will not lead to delay. Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg a Saesneg. Ni fydd gohebu yn Gymraeg yn arwain at oedi.

This document is also available in Welsh.

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Summary report

2018-19 performance audit work

- To decide the range and nature of the work we would undertake during the year, we considered how much we already know from all previous audit and inspection work and from other sources of information including Denbighshire County Council (the Council) own mechanisms for review and evaluation. For 2018-19, we undertook improvement assessment work; an assurance and risk assessment project and work in relation to the Wellbeing of Future Generations Act at all councils. At some councils, we supplemented this work with local risk-based audits, identified in the Audit Plan for 2018-19.
- The work carried out since the last Annual Improvement Report (AIR), including that of the relevant regulators, is set out in Exhibit 1.

The Council is meeting its statutory requirements in relation to continuous improvement but, as with all councils in Wales, it faces challenges going forward

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 Local Government Measure (2009) during 2019-20. However, all councils face significant financial pressures which will need continued attention in the short and medium term to enable them to reach a stable and sustainable financial position.

Recommendations and proposals for improvement

- 4 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, publish a report and make recommendations;
 and

- recommend to ministers of the Welsh Government that they intervene in some way.
- During the course of the year, the Auditor General did not make any formal recommendations. However, we have made a number of proposals for improvement and these are repeated in this report. We will monitor progress against them and relevant recommendations made in our national reports (Appendix 3) as part of our improvement assessment work.

Audit, regulatory and inspection work reported during 2018-19

Exhibit 1: audit, regulatory and inspection work reported during 2018-19

Description of the work carried out since the last Annual Improvement Report, including that of the relevant regulators, where relevant.

Issue date	Brief description	Conclusions	Proposals for improvement
February 2019	Assurance and Risk Assessment Project to identify the level of audit assurance and/or where further audit work may be required in future years in relation to risks to the Council: • putting in place proper arrangements to secure value for money in the use of resources;	Arising from our review and discussions with the Council we identified the following challenges for the Council for inclusion in our 2019-20 audit programme ¹ : • assurance and risk assessment: to identify the level of audit assurance and/or where further audit work may be required in future years in relation to risks to the Council putting in place proper arrangements to secure value for money in the use of resources. • financial sustainability: a project common to all	Not applicable
	putting in place arrangements to secure continuous improvement; and	local councils that will assess financial sustainability in light of current and anticipated future challenges.	
	acting in accordance with the sustainable development principle in setting wellbeing	social services budgetary and cost pressures: to assess the challenges associated with social services budgets.	

¹ Subject to change should any matters of risk arise in year

rief description	Conclusions	Proposals for improvement
objectives and taking steps to meet them.	 Well-being of Future Generations Act (Wales) 2015 (WFG Act) examinations: Focus on munciple waste. 	
Vell-being of Future enerations Act (Wales) 2015 VFG Act) examinations examination of the extent to which e Council has acted in ecordance with the sustainable evelopment principle when taking e following step: An examination if work to reduce the number of exoperties at risk of flooding in enbighshire.	The Council is taking promising action to act in accordance with the sustainable development principle when taking steps to reduce the risk of flooding but needs to consider its next steps to further embrace the principles of the Well-being of Future Generations (Wales) Act 2015: • the Council is taking steps to balance current and long-term needs through the focus on long-term flood prevention but needs to consider the sustainability of future work; • the Council understands current and future challenges in relation to flood risk management but, although it recognises opportunities to develop more sustainable complementary methods, it is not yet fully demonstrating an approach which tries to prevent problems arising in the future; • the Council has taken an integrated approach to delivering the work on flood management and has considered how project outcomes will benefit its partners as well as its own wellbeing objectives but there are opportunities for the Council to strengthen its approach; • collaborative working is a key component of the Council's approach and it has worked closely with partners on the design and delivery of flood	The Council elected to undertake a number of actions as a results of the review, these are detailed in our full report.
	objectives and taking steps to meet them. ell-being of Future enerations Act (Wales) 2015 IFG Act) examinations camination of the extent to which e Council has acted in cordance with the sustainable velopment principle when taking e following step: An examination 'work to reduce the number of operties at risk of flooding in	 Well-being of Future Generations Act (Wales) 2015 (WFG Act) examinations: Focus on munciple waste. The Council is taking promising action to act in accordance with the sustainable development principle when taking steps to reduce the risk of flooding but needs to consider its next steps to further embrace the principles of the Well-being of Future Generations (Wales) Act 2015: the Council is taking promising action to act in accordance with the sustainable development principle when taking steps to reduce the risk of flooding but needs to consider its next steps to further embrace the principles of the Well-being of Future Generations (Wales) Act 2015: the Council is taking promising action to act in accordance with the sustainable development principle when taking steps to reduce the risk of flooding but needs to consider its next steps to further embrace the principles of the Well-being of Future Generations (Wales) Act 2015: the Council is taking promising action to act in accordance with the sustainable development principle when taking steps to reduce the risk of flooding but needs to consider its next steps to further embrace the principles of the Well-being of Future Generations (Wales) Act 2015: the Council is taking promising action to act in accordance with the sustainable development principle when taking steps to reduce the risk of flooding but needs to consider its next steps to further embrace the principles of the Well-being of Future Generations (Wales) Act 2015: the Council is taking promising action to act in accordance with the sustainable development principle when taking steps to reduce the risk of flooding but needs to consider the sustainable to principle when taking steps to reduce the risk of flooding in the Council is taking steps to reduce the risk of flooding in the future Generations (Wales) Act 2015: the Council is taking steps to balance current and long-term needs through the r

Issue date	Brief description	Conclusions	Proposals for improvement		
		community and other landowners could be strengthened; and • the Council is effectively involving stakeholders in the design and delivery of flood management schemes and is responsive to local needs but recognises further work is needed to involve stakeholders and learn from its approach to date.			
November 2018	Annual audit letter 2017-18 Letter summarising the key messages arising from the Auditor General's statutory responsibilities under the Public Audit (Wales) Act 2004 and his reporting responsibilities under the Code of Audit Practice. The Annual Audit Letter is in Appendix 2 of this report.	 The Council complied with its responsibilities relating to financial reporting and use of resources; I am satisfied that the Council has appropriate arrangements in place to secure economy, efficiency and effectiveness in its use of resources; my work to date on certification of grant claims and returns has not identified significant issues that would impact on the 2018-19 accounts or key financial systems; and the Council has a track record of managing its finances, but the significant financial challenge will continue over the medium term. 	None		
Local risk-based	Local risk-based performance audit				
December 2018	Local government use of data local report	The accompanying national report to the local report concluded that local authorities across Wales are slow to develop a culture that values and uses data effectively to improve services and outcomes.	P1 Standardising its data is an area where the Authority can make further improvements. Respondents to our data tool cited a need to integrate 'data held in department silos'. Developing a		

Issue date	Brief description	Conclusions	Proposals for improvement
			more unified and corporate approach to using data will help to extend the benefits of data-led decisions to all service areas. A change in culture will be crucial in order to do this and standardise, streamline and integrate data. To begin this process, the Authority should complete a data audit focusing on mapping who holds what data, for what purpose and how it is used.Data tool respondents acknowledge that GDPR may help in this regard but that at present, data held in different forms across the organisation has led to incompatible systems and dispersed ownership of various datasets.
			P2 The Authority collects data at almost every interaction with its citizens, whether face to face, over the phone or on social media and it needs to ensure it continues to protect the information it holds whilst making the best use of this wealth of data. Updating data sharing protocols and ensuring they are communicated to all relevant officers via refresher training —

Issue date	Brief description	Conclusions	Proposals for improvement
			focusing on what people can do rather than what they cannot do – will help to ensure that service managers know when and what they can share, thereby helping to avoid unnecessary and disproportionate risk aversion when it comes to data sharing.
			P3 Ensuring adequate resources and sufficient capacity are on-going challenges for all local authorities. In Denbighshire, a significant proportion of senior officers who responded to our data tool do not believe the Authority has invested sufficient resources to analyse data effectively. Without upskilling staff to make better use of data the Authority risks missing opportunities to improve its efficiency and effectiveness in the long-term. Investing to make better use of data will result in better outcomes for citizens and create long-term efficiencies for the Authority. The Well-being of Future Generations (Wales) Act 2015 provides the perfect impetus for the Authority to think long-term.
			P4 The Authority should review the range and quality of the information

Issue date	Brief description	Conclusions	Proposals for improvement	
			needed by decision makers and the format it is presented in. This will enable the Authority to set corporate data reporting standards to ensure the data that is presented to senior officer and Elected Members is accessible, easily understandable and equips decision makers to fulfil their responsibilities as effectively as possible.	
June 2019	Leisure services	. The Council's continued investment in leisure facilities has secured good customer satisfaction, but later stages of its otherwise effective arrangements for considering alternative delivery models were rushed compromising governance	P1 The Council should ensure that it does not compromise governance, by setting enough time for good decision making and ensuring that all information is available in good time. For example, by allowing sufficient time for pre-decision scrutiny.	
Improvement	Improvement planning and reporting			
April 2018	Wales Audit Office annual improvement audit Review of the Council's published plans for delivering on improvement objectives.	The Council has complied with its statutory improvement planning duties.	None	

Issue date	Brief description	Conclusions	Proposals for improvement		
October 2018	Wales Audit Office annual assessment of performance audit Review of the Council's published performance assessment.	The Council has complied with its statutory improvement reporting duties.	None		
Reviews by ins	Reviews by inspection and regulation bodies				
Care Inspectorate Wales (CIW) and Estyn	There were no Denbighshire County Council inspections in this period, but as usual Estyn inspected schools and services that are registered with CiW were subject to regular review.		Not Applicable		

Appendix 1

Status of this report

The Local Government (Wales) Measure 2009 (the Measure) requires the Auditor General to undertake a forward-looking annual improvement assessment, and to publish an annual improvement report, for each improvement authority in Wales. Improvement authorities (defined as local councils, national parks, and fire and rescue authorities) have a general duty to 'make arrangements to secure continuous improvement in the exercise of [their] functions'.

The annual improvement assessment considers the likelihood that an authority will comply with its duty to make arrangements to secure continuous improvement. The assessment is also the main piece of work that enables the Auditor General to fulfil his duties. Staff of the Wales Audit Office, on behalf of the Auditor General, produce the annual improvement report. The report discharges the Auditor General's duties under section 24 of the Measure, by summarising his audit and assessment work in a published annual improvement report for each authority. 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.

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

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Please contact us in Welsh or English.

Cysylltwch â ni'n Gymraeg neu'n Saesneg.

Councillor Hugh Evans – Leader Judith Greenhalgh – Chief Executive Denbighshire County Council County Hall Wynnstay Road Ruthin LL15 1YN

Reference: 958A2018-19

Date issued: 30 November 2018

Dear Councillor Evans and Judith Greenhalgh

Annual Audit Letter - Denbighshire County Council 2017-18

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

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

It is Denbighshire County Council's (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 financial statements 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 me 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 that I have completed 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.

We received the draft financial statements on 15 June 2018, two weeks earlier than the statutory deadline. Despite the shorter timescale, the draft financial statements were prepared to a good standard and were supported by comprehensive and timely working papers. The key matters arising from the audit of the financial statements were reported to members of the Corporate Governance Committee in my Audit of Financial Statements report on the 26 September 2018.

On 28 September 2018, I issued an unqualified audit opinion on the Council's financial statements confirming that they present a true and fair view of the Council's financial position and transactions. I issued the certificate confirming that the audit of the accounts had been completed on the 28 September 2018.

I am satisfied that the Council has appropriate arrangements in place to secure economy, efficiency and effectiveness in its use of resources

My 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 under the Local Government (Wales) Measure 2009. The Auditor General published his Annual Improvement Report in September 2018 and concluded that the Council was meeting its statutory requirements in relation to continuous improvement.

My work to date on certification of grant claims and returns has not identified significant issues that would impact on the 2018-19 accounts or key financial systems

My ongoing work on the certification of grants claims and returns has not identified any significant issues to date in relation to the accounts or the Council's key financial systems. I will report any key issues to the Corporate Governance Committee in my annual Grants Certification report once this year's programme of certification work is complete.

The Council has a track record of managing its finances, but the significant financial challenge will continue over the medium term

Austerity remains the most significant challenge facing local government bodies in Wales and these financial pressures are likely to continue for the medium term. The recent local government funding settlement will see the Council's funding decrease by 0.5%.

In 2017-18 the Council reported a £1.1 million underspend, achieved in part through a £2.1 million budgeted contribution from earmarked reserves used to fund service pressures. As at 31 March 2018, the Council maintained its Council Fund reserve at £7.5 million and held £29.4 million in earmarked reserves (excluding the Housing Revenue Account).

In order to set a balanced budget for 2018-19, the Council had to identify efficiencies and savings of £4.6 million. As at October 2018, the Council reported that the majority of the required efficiencies and savings had been achieved and was on track to deliver the £4.6 million. Nevertheless, the Council was projecting a year-end overspend of £1.2 million on services and corporate budgets primarily due to continuing cost pressures within Highways and Environment and the Education and Children's Service. The Chief Finance Officer included commentary within the October 2018 Finance Report to Cabinet, emphasising the importance of services continuing to manage budgets both in the current financial year and beyond, particularly in light of the continuing financial pressures.

The Council's financial outlook remains very challenging and the latest published forward financial plan projected a revenue funding shortfall of £6.4 million in 2019-20. In response to the financial pressures, the Council established its 'Reshaping the Council Board' in January 2018 with responsibility for developing the next iteration of the Council's Medium Term Financial Strategy, supporting the delivery of Corporate priorities, driving the wider strategic direction of the Council but also ensuring there is an effective process in place to deliver a balanced budget annually.

The challenging financial position represents a significant risk to the Council. Managing the financial position in 2018-19 and setting a balanced budget for 2019-20 are key priorities coupled with updating its medium term financial strategy. We will continue to monitor progress.

The financial audit fee for 2017-18 is currently expected to be in line with the agreed fee set out in the Annual Audit Plan.

Yours sincerely

Anthony Veale

New project R

Engagement Director

For and on behalf of the Auditor General for Wales

Appendix 3

National report recommendations 2018-19

Exhibit 2: national report recommendations 2018-19

Summary of proposals for improvement relevant to local government, included in national reports published by the Wales Audit Office, since publication of the last AIR.

Date of report	Title of review	Recommendation
October 2018	Procuring Residual and Food Waste Treatment Capacity	R1 The projections for the three residual waste projects in the Programme assume that, across the 14 councils involved, the overall amount of residual waste will increase through the lifetime of the contracts. If these projections are accurate then something significant would have to occur beyond 2040 to reach zero waste across these council areas by 2050. If the projections are not accurate then there is the risk that councils will pay for capacity they do not need. We recommend that the Welsh Government:
		 in reviewing the Towards Zero Waste strategy, considers how its ambition of there being no residual waste by 2050 aligns with current projections for residual waste treatment; and works with councils to consider the impact of changes in projections on the likely cost of residual waste projects and any mitigating action needed to manage these costs.
		R2 The Welsh Government's programme support to date has mainly focused on project development and procurement. Now that most of the projects are operational, the focus has

Date of report	Title of review	Recommendation
		shifted to contract management. We recommend that the Welsh Government continue its oversight of projects during the operational phase by:
		 building on its existing model of providing experienced individuals to assist with project development and procurement and making sure input is available to assist with contract management if required;
		 setting out its expectations of councils regarding contract management;
		ensuring partnerships revisit their waste projections and associated risks periodically, for example to reflect updated population projections or economic forecasts; and
		obtaining from partnerships basic management information on gate fees paid, amount of waste sent to facilities and quality of contractor service.
November 2018	Local Government Services to Rural Communities	R1 Socio economic change, poor infrastructure and shifts in provision of key services and facilities has resulted in the residualisation of communities in rural Wales. We recommend that Welsh Government support public bodies to deliver a more integrated approach to service delivery in rural areas by:
		refreshing rural grant programmes to create sustainable financial structures, with multi-year allocations; and
		helping people and businesses make the most of digital connectivity through targeted and more effective business and adult education support programmes.
		R2 The role of Public Service Boards is evolving but there are opportunities to articulate a clearer and more ambitious shared vision for rural Wales (see paragraphs 2.2 to 2.9 and

Date of report	Title of review	Recommendation
		2.28 to 2.31). We recommend that PSB public services partners respond more effectively to the challenges faced by rural communities by:
		assessing the strengths and weaknesses of their different rural communities using the Welsh Governments Rural Proofing Tool and identify and agree the local and strategic actions needed to support community sustainability; and
		ensuring the Local Well-Being Plan sets out a more optimistic and ambitious vision for 'place' with joint priorities co-produced by partners and with citizens to address agreed challenges.
		R3 To help sustain rural communities, public services need to think differently in the future (see paragraphs 3.1 to 3.12). We recommend councils provide a more effective response to the challenges faced by rural communities by:
		 ensuring service commissioners have cost data and qualitative information on the full range of service options available; and
		 using citizens' views on the availability, affordability, accessibility, adequacy and acceptability of council services to shape the delivery and integration of services.
		R4 To help sustain rural communities, public services need to act differently in the future (see paragraphs 3.1 to 3.12). We recommend councils do more to develop community resilience and self-help by:
		 working with relevant bodies such as the Wales Co-operative Centre to support social enterprise and more collaborative business models;

Date of report	Title of review	Recommendation
		 providing tailored community outreach for those who face multiple barriers to accessing public services and work; enhancing and recognising the role of town and community councils by capitalising on their local knowledge and supporting them to do more; encouraging a more integrated approach to service delivery in rural areas by establishing panpublic service community hubs, networks of expertise, and clusters of advice and prevention services; enabling local action by supporting community asset transfer identifying which assets are suitable to transfer, and having the right systems in place to make things happen; and
		 improving community-based leadership by developing networks of interest, training and coaching, and encouraging volunteering.
November 2018	Waste Management in Wales: Municipal Recycling	R1 Benchmarking work has found that the cost of certain waste management services show surprising variation (paragraphs 1.31-1.39). The Welsh Government should work with councils to understand better the basis of the variation in spending on waste management services that are fundamentally the same and ensure that waste management costs are accounted for in a consistent way.
		R2 The Welsh Government believes that, if applied optimally, its Collections Blueprint offers the most cost-effective overall means of collecting recyclable resources but is planning further analysis (paragraphs 1.40-1.51). When undertaking its further analysis to understand better the reasons for differences in councils' reported costs, and the impact on costs where councils have adopted the Collections Blueprint, we recommend that the Welsh Government:

Date of report	Title of review	Recommendation
		explores how the cost of collecting dry recyclables may affect the overall cost of providing kerbside waste management services to households; and compares the actual costs with the costs modelled previously as part of the Welsh Government-commissioned review of the Collections Blueprint for councils that now operate the Collections Blueprint. R3 The Welsh Government has undertaken to consider alternatives to the current weight-based recycling targets which can better demonstrate the delivery of its ecological footprint and carbon reduction goals (paragraphs 2.38-2.45). We recommend that the Welsh Government replace or complement the current target to recycle, compost and reuse wastes with performance measures to refocus recycling on the waste resources that have the largest impact on carbon reduction, and/or are scarce. We recognise that the Welsh Government may need to consider the affordability of data collection for any
		R4 In refreshing Towards Zero Waste, the Welsh Government needs to show that wider sustainability benefits sought through municipal recycling offer value and cannot be more readily attained in other ways and at lower cost including, but not necessarily limited to, other waste management interventions (paragraphs 2.52-2.53). The Welsh Government should demonstrate in the revised waste strategy that not only is it possible to recycle a greater proportion of municipal waste, but how doing so maximises its contribution to achieving its sustainable development objectives.
November 2018	Provision of Local Government Services to Rural	R1 Local authorities need to do more to make CATs (Community Asset Transfers) simpler and more appealing,

Date of report	Title of review	Recommendation
	Communities: Community Asset Transfer	help build the capacity of community and town councils, give them more guidance in raising finance, and look to support other community development models such as social enterprises that support social value and citizen involvement. In addition, we recommend that local authorities monitor and publish CAT numbers and measure the social impact of CATs.
		R2 Local authorities have significant scope to provide better and more visible help and support before, during, and after the community asset transfer process. We conclude that there is considerable scope to improve the business planning, preparation, and aftercare for community asset transfer. We recommend that local authorities:
		identify community assets transfer's role in establishing community hubs, networks of expertise and clusters of advice and prevention services;
		 work with town and community councils to develop their ability to take on more CATs; identify which assets are suitable to transfer, and
		clarify what the authority needs to do to enable their transfer;
		ensure their CAT policy adequately covers aftercare, long term support, post transfer support, signposting access to finance, and sharing the learning about works well; and
		 support community-based leadership by developing networks of interest, training and coaching, and encouraging volunteering.
December 2018	The maturity of local government in use of data	R1 Part 1 of the report highlights the importance of creating a strong data culture and clear leadership to make better use of data. We recommend that local authorities:
		have a clear vision that treats data as a key resource;

Date of report	Title of review	Recommendation
		 establish corporate data standards and coding that all services use for their core data; undertake an audit to determine what data is held by services and identify any duplicated records and information requests; and create a central integrated customer account as a gateway to services.
		R2 Part 2 of the report notes that whilst it is important that authorities comply with relevant data protection legislation, they also need to share data with partners to ensure citizens receive efficient and effective services. Whilst these two things are not mutually exclusive, uncertainty on data protection responsibilities is resulting in some officers not sharing data, even where there is agreement to provide partners with information. We recommend that authorities: • 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.
		R3 In Part 3 of our report, we conclude that adequate resources and sufficient capacity are ongoing challenges. However, without upskilling staff to make better use of data, authorities are missing opportunities to improve their efficiency and effectiveness. We recommend that authorities:
		identify staff who have a role in analysing and managing data to remove duplication and free up resources to build and develop capacity in data usage; and

Date of report	Title of review	Recommendation
		 invest and support the development of staff data analytical, mining and segmentation skills. R4 Part 4 of our report highlights that authorities have more to do to create a data-driven decision-making culture and to unlock the potential of the data they hold. We recommend that local authorities:
		 set data reporting standards to ensure minimum data standards underpin decision making; and make more open data available.
March 2019	Waste Management in Wales - Preventing waste	R1 Increasing the focus on waste prevention to reflect the overall aims of Towards Zero Waste
		Available data on the amount of waste produced suggests mixed progress to deliver the Welsh Government's waste prevention targets. We recommend that the Welsh Government:
		a) revisits the relative priority it gives to recycling and waste prevention as part of its review of Towards Zero Waste;
		b) sets out clearly the expectations on different organisations and sectors for waste prevention; and
		c) revisits its overall waste prevention targets and the approach it has taken to monitor them in light of progress to date, examples from other countries and in the context of current projections about waste arising through to 2050.
		R2 Improving data on commercial, industrial, construction and demolition waste
		The Welsh Government is a partner in initial work to assess the feasibility of developing a new digital solution to track all waste. If this preferred option does not succeed, we recommend that the Welsh Government works with Natural Resources Wales to explore the costs and benefits of other options to improve non-municipal waste data in Wales, including additional powers to require waste data from businesses.

Date of report	Title of review	Recommendation
		R3 Enhancing producer responsibility and using more legal, financial and fiscal levers
		The Welsh Government has opportunities to influence waste prevention through legislation and financial incentives. It can also influence changes at UK level where fiscal matters are not devolved. We recommend that the Welsh Government consider whether provisions to extend producer responsibility and the use of financial powers such as grant conditions, fiscal measures and customer charges and incentives, are needed to promote and to prioritise waste prevention.

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