

Causeway Coast and Glens Borough Council

Audit and Assessment Report 2021-22

Report to the Council and the Department for Communities under Section 95 of the Local Government (Northern Ireland) Act 2014



25 February 2022

Contents

Page

1. Key Messages	3
2. Audit Scope	5
3. Audit Findings	6
4. Annexes	8

We have prepared this report for sole use of Causeway Coast and Glens Borough Council and the Department for Communities. You must not disclose it to any third party, quote or refer to it, without our written consent and we assume no responsibility to any other person.

1. Key Messages

Summary of the audit

Audit outcome	Status
Audit opinion	Unqualified opinion
Audit assessment	The LGA has concluded that she is unable to assess whether the Council is unlikely to comply with Part 12 of the Local Government Act (Northern Ireland) 2014 during 2021-22 due to the impact of the COVID-19 pandemic on normal services.
Statutory recommendations	The LGA made no statutory recommendations
Proposals for improvement	The LGA made three new proposals for improvement

This report summaries the work of the Local Government Auditor (LGA) on the 2021-22 performance improvement audit and assessment undertaken on Causeway Coast and Glens Borough Council. We would like to thank the Chief Executive and his staff, particularly the Performance Improvement Manager, for their assistance during this work.

We consider that we comply with the Financial Reporting Council (FRC) ethical standards and that, in our professional judgment, we are independent and our objectivity is not compromised.

Audit Opinion

The LGA has certified the performance arrangements with an unqualified audit opinion, without modification. She certifies an improvement audit and improvement assessment has been conducted. The LGA also states that, as a result, she believes that Causeway Coast and Glens Borough Council (the Council) has discharged its performance improvement and reporting duties, including its assessment of performance for 2020-21 and its 2021-22 improvement plan, and has acted in accordance with the Guidance.

Audit Assessment

The LGA has assessed whether the Council is likely to comply with its performance improvement responsibilities under Part 12 of the Local Government Act (Northern Ireland) 2014 (the Act). This is called the 'improvement assessment'.

In normal circumstances this work would have been undertaken in time for this report to be issued by 30 November 2021. However, this was impacted by delays in completing the previous period's report when legislative changes were required to clarify the performance improvement arrangements before work could be concluded.

In light of the impact of the COVID-19 pandemic on council services, the LGA has concluded that she is unable to reach an opinion on whether the Council was likely to have complied with its performance improvement responsibilities for 2021-22.

The LGA did not exercise her discretion to assess and report whether the council is likely to comply with these arrangements in future years.

Audit Findings

During the audit and assessment we identified no issues requiring a formal recommendation under the Act. We made three proposals for improvement (see Section 3). These represent good practice which should assist the Council in meeting its responsibilities for performance improvement. Detailed observations on thematic areas are provided in Annex B.

Status of the Audit

The LGA's audit and assessment work on the Council's performance improvement arrangements is now concluded. By March 2022 she will publish an Annual Improvement Report on the Council on the NIAO website, making it publicly available. This will summarise the key outcomes in this report.

The LGA did not undertake any Special Inspections under the Act in the current year.

Management of information and personal data

During the course of our audit we have access to personal data to support our audit testing. We have established processes to hold this data securely within encrypted files and to destroy it where relevant at the conclusion of our audit. We can confirm that we have discharged those responsibilities communicated to you in accordance with the requirements of the General Data Protection Regulations (GDPR) and the Data Protection Act 2018.

2. Audit Scope

Part 12 of the Act provides all councils with a general duty to make arrangements to secure continuous improvement in the exercise of their functions. It sets out:

- a number of council responsibilities under a performance framework; and
- key responsibilities for the LGA.

The Department for Communities (the Department) has published '*Guidance for Local Government Performance Improvement 2016*' (the Guidance) which the Act requires councils and the LGA to follow. Further guidance to clarify the requirements of the general duty to improve was issued by the Department during 2019.

The improvement audit and assessment work is planned and conducted in accordance with legislative requirements.

The improvement audit

Each year the LGA has to report whether each council has discharged its duties in relation to improvement planning, the publication of improvement information and the extent to which each council has acted in accordance with the Department's Guidance. The procedures conducted in undertaking this work are referred to as an "improvement audit". During the course of this work the LGA may make statutory recommendations under section 95 of the Act.

Due to the impact of COVID-19, legislation was amended so that councils were not required to produce a Performance Improvement Plan for 2020-21, and thus there was no requirement to set self-imposed objectives for that year. As a result of this councils did not have to perform a self-assessment of self-imposed objectives in their 2020-21 self-assessment report, nonetheless the report was still required to note outturn performance on the statutory indicators and how the general duty to improve was taken forward during the year.

The improvement assessment

The LGA also has to assess annually whether a council is likely to comply with the requirements of Part 12 of the Act, including consideration of the arrangements to secure continuous improvement in that year. This is called the 'improvement assessment'. She also has the discretion to assess and report whether a council is likely to comply with these arrangements in future years.

The annual improvement report on the Council

The Act requires the LGA to summarise all of her work (in relation to her responsibilities under the Act) at the Council, in an 'annual improvement report'. This will be published on the NIAO website by March 2022, making it publicly available.

Special inspections

The LGA may also, in some circumstances, carry out special inspections which will be reported to the Council and the Department, and which she may publish.

3. Audit Findings

This section outlines key observations in the form of proposals for improvement, arising from following thematic areas of the Council’s audit and assessment:

- General duty to improve;
- Governance arrangements;
- Improvement objectives;
- Consultation;
- Improvement plan;
- Arrangements to improve;
- Collection, use and publication of performance information; and
- Demonstrating a track record of improvement.

These are not formal recommendations, which are more significant matters which require action to be taken by the Council in order to comply with the Act or Guidance. Proposals for improvement include matters which, if accepted, will assist the Council in meeting its performance improvement responsibilities. The LGA may follow up how key proposals have been addressed in subsequent years. We recommend however that the Council’s Audit Committee track progress on all proposals for improvement.

Our procedures were limited to those considered necessary for the effective performance of the audit and assessment. Therefore, the LGA’s observations should not be regarded as a comprehensive statement of all weaknesses which exist, or all improvements which could be made.

Detailed observations for the thematic areas can be found at **Annex B**.

Thematic area	Issue	Proposal for improvement
General Duty	Council needs to be able to clearly demonstrate that robust and transparent arrangements and processes are in place through which functions and services which would benefit most from improvement are identified, prioritised and selected. Whilst the process of development and shaping of improvement objectives has improved within Council, it is still primarily based on a top-down approach.	Council needs to further develop and refine arrangements and processes around the identification, prioritisation and selection of functions or services for improvement, with discussions and decisions made documented fully.
Governance Arrangements	A number of Proposals for Improvement identified in previous years have yet to be fully implemented by Council. Whilst Council currently tracks recommendations arising from the NIAO’s Financial Audit,	Council should ensure that a suitable mechanism is developed to track the implementation of Proposals for Improvement.

Thematic area	Issue	Proposal for improvement
	<p>implementation of Proposals for Improvement arising from the review of the Local Government Auditor's Performance Improvement annual audit and assessment work do not appear to be tracked.</p>	<p>A progress report on implementation of all Proposals for Improvement should be provided to the Corporate Policy and Resources Committee and the Audit Committee on a regular basis. Where a Proposal for Improvement is no longer relevant, it would be helpful for the reason to be provided in the progress report.</p>
<p>Improvement Objectives</p>	<p>Establishing clear baseline data to identify areas of improvement, set targets and to measure performance improvement against is vital. Without these it will be difficult to clearly demonstrate improvement.</p> <p>Some of the Council's current improvement objectives are broad, may take several years to be delivered, and are focussed on outputs rather than outcomes. For example, agreeing funding and governance arrangements is an output, not an outcome i.e. a measurable difference made.</p>	<p>Where possible and relevant, clear baselines, targets and KPIs should be in place for all Improvement Objectives, projects and self-imposed indicators.</p> <p>Council should avoid improvement objectives that are excessively broad or that may take several years to demonstrate an improvement for citizens. Focus should be on outcomes rather than outputs.</p>

4. Annexes



Annex A – Audit and Assessment Certificate

Audit and assessment of Causeway Coast and Glens Borough Council's performance improvement arrangements

Certificate of Compliance

I certify that I have audited Causeway Coast and Glens Borough Council's (the Council) assessment of its performance for 2020-21 and its improvement plan for 2021-22 in accordance with section 93 of the Local Government Act (Northern Ireland) 2014 (the Act) and the Code of Audit Practice for local government bodies.

I also certify that I have performed an improvement assessment for 2021-22 at the Council in accordance with Section 94 of the Act and the Code of Audit Practice.

This is a report to comply with the requirement of section 95(2) of the Act.

Respective responsibilities of the Council and the Local Government Auditor

Under the Act, the Council has a general duty to make arrangements to secure continuous improvement in the exercise of its functions and to set improvement objectives for each financial year. The Council is required to gather information to assess improvements in its services and to issue a report annually on its performance against indicators and standards which it has set itself or which have been set for it by Government departments.

The Act requires the Council to publish a self-assessment before 30 September in the financial year following that to which the information relates, or by any other such date as the Department for Communities (the Department) may specify by order. The Act also requires that the Council has regard to any guidance issued by the Department in publishing its assessment.

As the Council's auditor, I am required by the Act to determine and report each year on whether:

- The Council has discharged its duties in relation to improvement planning, published the required improvement information and the extent to which the Council has acted in accordance with the Department's guidance in relation to those duties; and
- The Council is likely to comply with the requirements of Part 12 of the Act.

Scope of the audit and assessment

For the audit I am not required to form a view on the completeness or accuracy of information or whether the improvement plan published by the Council can be achieved. My audits of the Council's improvement plan and assessment of performance, therefore, comprised a review of the Council's publications to ascertain whether they included elements prescribed in legislation. I also assessed whether the arrangements for publishing the documents complied with the requirements of the legislation, and that the Council had regard to statutory guidance in preparing and publishing them.

For the improvement assessment I am required to form a view on whether the Council is likely to comply with the requirements of Part 12 of the Act, informed by:

- A forward looking assessment of the Council's likelihood to comply with its duty to make arrangements to secure continuous improvement; and

- A retrospective assessment of whether the Council has achieved its planned improvements to inform a view as to its track record of improvement.

My assessment of the Council's improvement responsibilities and arrangements, therefore, comprised a review of certain improvement arrangements within the Council, along with information gathered from my improvement audit.

The work I have carried out in order to report and make recommendations in accordance with sections 93 to 95 of the Act cannot solely be relied upon to identify all weaknesses or opportunities for improvement.

Audit opinion

Improvement planning and publication of improvement information

As a result of my audit, I believe the Council has discharged its duties in connection with (1) improvement planning and (2) publication of improvement information in accordance with section 92 of the Act and has acted in accordance with the Department for Communities' guidance sufficiently.

Improvement assessment

In light of the impact of COVID-19 on Council services I have been unable to assess whether the Council has discharged its duties under Part 12 of the Act and has acted in accordance with the Department for Communities' guidance sufficiently during 2021-22.

I have not conducted an assessment to determine whether the Council is likely to comply with the requirements of Part 12 of the Act in subsequent years. I will keep the need for this under review as arrangements become more fully established.

Other matters

I have no recommendations to make under section 95(2) of the Local Government (Northern Ireland) Act 2014.

I am not minded to carry out a special inspection under section 95(2) of the Act.



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25 February 2022

Annex B – Detailed observations

Thematic area	Observations
<p>General duty to improve</p>	<p>The Council continues to make progress with putting arrangements in place to select objectives and establish a system to ensure continuous improvement in order to achieve its general duty to The Council has been working to develop and grow a culture of performance, improvement and reporting within its corporate structures and across all council services and functions. However, the Council needs continue to develop and formalise processes and standardise documentation around improvement objectives, projects and monitoring reports.</p> <p>Objectives are subject to appropriate levels of scrutiny. The Performance Improvement Plan is recommended for approval by Council’s Corporate Policy and Resources Committee before final ratification by full Council in June each year. However, the process by which services and projects for improvement are identified, prioritised and selected should be formalised, with discussions and decisions documented. A proposal for improvement in relation to this issue has been included in Section 3.</p> <p>The Performance Improvement Officer continues to develop the performance management framework and system to enable the performance of all its functions and services to be measured, to support the identification of those areas which would benefit most from improvement, and to monitor and report on performance improvement across all services as well as specifically against improvement objectives and projects.</p> <p>As KPIs continue to be developed across all services, the use of the PERFORM Performance Management software should continue to improve the efficiency and effectiveness of monitoring and reporting on Performance and Budgets across all services and function.</p> <p>These developments also enable the Corporate Policy & Resources Committee, other functional committees and the senior management team to ensure they are subjecting the Council’s priorities, improvement objectives, activities, projects, risks and performance to appropriate scrutiny, challenge and evaluation.</p>

Thematic area	Observations
<p>Governance arrangements</p>	<p>The Council needs to ensure that committees and the senior management team are subjecting the Council’s priorities, improvement objectives, activities, projects, risks and performance to appropriate scrutiny, challenge, reporting and evaluation.</p> <p>The Corporate Policy and Resources (CP&R) Committee takes the lead in terms of scrutiny, reporting and overseeing the annual Performance Improvement Plans and self-assessment documents, with the Performance Team providing a quarterly update on performance improvement to the Committee. The Audit Committee maintains a monitoring role as the performance improvement process.</p> <p>Council has increased investment and focus on performance management to help develop and grow a culture of performance, improvement and reporting within its corporate structures. Council now has an improvement objective to develop and embed improvements to performance improvement and business planning processes. As a result, there has been much progress in developing, establishing and embedding a performance improvement framework, including governance arrangements and performance management software, into the day to day operation of the Council.</p> <p>The following arrangements are now in place, but should become further embedded over time:</p> <ul style="list-style-type: none"> • The process for monitoring, tracking and reporting on the progress of the Performance Improvement Plan is managed on a day-to-day basis by the Council’s Performance Team. • The performance management software system, PERFORM, includes indicators and measures of activity all across the work of Council. The format and level of detail included continues to be further developed. • The Performance Team now works closely with service level colleagues to provide quarterly updates against the targets and outputs within the relevant Performance Improvement Plan. <p>Whilst improvement is not a prescribed permanent agenda item at the CP&R Committee, performance is a regular agenda item.</p> <p>We noted during the course of our audit that some progress has been made on the implementation of previous Proposals for Improvement. However, while the Section 95 Report is brought to the CP&R Committee and the Audit Committee, progress on implementation of all previous Proposals for Improvement made by the NIAO do not appear to be reported or monitored by these Committees. A proposal for improvement in relation to this issue has been included in Section 3.</p>

Thematic area	Observations
	<p>The Council's Performance Improvement Policy, which reflects the revised Governance arrangements, and also the Terms of Reference for CP&R Committee, need to be updated, and an agreed and documented performance improvement cycle for Council should be established. The Council have advised that there is a commitment to do undertake this work during 2022.</p>
<p>Improvement objectives</p>	<p>The 2021-22 Performance Improvement Plan (PIP) was published in June 2021. The improvement objectives within it were developed and selected on the basis of a range of factors including engagement with Elected Members, Senior Management Team, Heads of Service, and consultation with citizens.</p> <p>The five improvement objectives for 2021-22 have clear links to service programmes and the Council has established arrangements to deliver projects and actions to try to secure achievement of its improvement objectives.</p> <p>The PIP sets out the following for each improvement objective:</p> <ul style="list-style-type: none"> • the link to the Community Plan and Corporate Plan as well as the seven aspects of improvement; • the Senior Responsible Officer; • why the objective was chosen; • outputs - what they will do in terms of projects and actions; and • outcomes – the measurable difference made. <p>In previous Section 95 reports we made Proposals for Improvement to develop improvement objectives which are more specific, outcomes focused and achievable. We also emphasised the importance of ensuring that any improvement can be clearly demonstrated at objective level and project/action level. Whilst some progress has been made, baseline data and information against which future improvement can be demonstrated and targets are not included in the PIP for all objectives. In addition, while the Council may be able to demonstrate progress in achieving some improvement objectives in the short term, other may take several years to demonstrate an improvement for citizens. A proposal for improvement in relation to this issue has been included in Section 3.</p>
<p>Consultation</p>	<p>The Council's consultation process for the 2021-22 PIP was significantly affected by the impact of the COVID-19 pandemic and the limits on formal gatherings, events and face to face contacts. The Council published an online survey asking citizens for their opinions on performance improvement objectives. The survey opened on 7 May 2021 and remained open until the end of June 2021. As well as the online survey, views were sought via social media, the staff newsletter and the Council</p>

Thematic area	Observations
	<p>website. Council received 30 responses including over 200 separate comments. The Performance Team also engaged with Council Heads of Service and Directors on improvement requirements within their service area.</p> <p>Overall, the Council had a majority agreement from consultees on proceeding with the draft improvement objectives. Dealing with the current and ongoing impacts of the pandemic was a concern for many residents. They also significant concerns in relation to environmental protection, finance and the economy. The improvement objectives for 2021-22 support these themes.</p> <p>Council recently conducted a citizens' survey, receiving 2,360 detailed responses, which represented a response rate of 82 percent. Council is currently reviewing all the responses and advised that the results will be used to assist in the identification of improvement objectives for the 2022-23 Performance Improvement Plan.</p>
Improvement plan	<p>The Council published its Performance Improvement Plan (PIP) on time on 30 June 2021 and it meets the requirements of legislation.</p> <p>Proposals for Improvement from previous years in relation to the content of the PIP have been acted upon. For example, the PIP now includes details on:</p> <ul style="list-style-type: none"> • arrangements to discharge Council's general duty to improve; • how the individual projects address particular objectives and how they provide positive benefits for citizens/ratepayers; • governance arrangements; • the Council's arrangements to secure continuous improvement in the exercise of its functions; • linking previous plan and objectives to 2021-22 Plan; and • a suite of self-imposed indicators. <p>The PIP is available in electronic format on the Council's website and a copy upon request. The Council also has a section on its website dedicated to Performance Improvement which includes the PIP, the self-assessment and the consultation report. Whilst the PIP itself provides contact details and indicates that comments or suggestions are welcomed at any time</p>

Thematic area	Observations
	<p>of the year, it would be useful if this was also stated on the Performance Improvement section of the Council’s website. Council should continue to promote the PIP in the citizens’ newsletter and staff news.</p>
<p>Arrangements to improve</p>	<p>The Council is required to establish arrangements to deliver on its improvement objectives each year. The Department for Communities’ guidance states that the Council should be able to understand and demonstrate the impact of its arrangements for continuous improvement on the outcomes for citizens.</p> <p>The Council has made significant progress over the last two years putting arrangements in place to secure continuous improvement in the exercise of its functions in order to achieve its general duty to improve. Senior Officers are becoming more involved in the development and shaping of objectives, and these are increasingly embedded with the overall business planning and performance management cycle.</p> <p>For example: the development of KPIs across all Council services and functions alongside the Performance Management Software PERFORM should improve the efficiency and effectiveness of monitoring and reporting on performance across the Council. This should enable greater transparency and the collection and use of data to identify areas in need of improvement; measure and report on performance; and more clearly demonstrate improvement achieved.</p> <p>The underlying projects in relation to the improvement objectives are supported in some degree by delivery plans and budgets and are being project managed and have clear lines of accountability to Senior Management and Members. However, documentation and arrangements vary. Consequently arrangements for delivery of projects is not always clear and transparent and the level of detail and quality is not consistent across all services. Whilst the Council has started to address this issue, there is a need to further develop formal and standardised processes and documentation around identification and selection of improvement objectives and projects, the plans for delivery of each improvement objective and project, and the monitoring and reporting on progress and performance.</p>
<p>Collection, use and publication of performance information</p>	<p>The Council’s 2020-21 Performance Improvement Self-Assessment Report presents the results of the Council’s self-assessment in discharging its general duty under Part 12 of the Local Government Act (Northern Ireland) 2014 in relation to performance improvement arrangements. It sets out an assessment of the Council’s performance against the following:</p> <ul style="list-style-type: none"> • Statutory performance indicators and standards for the functions of Economic Development, Planning and Waste for 2020-21 including comparison with previous four years; • Performance information on self-imposed indicators and standards collected during 2020-21; and

Thematic area	Observations
	<ul style="list-style-type: none"> • Performance information on the two Improvement Objectives rolled over from the 2019-20 to the 2021-22 (as there was no Performance improvement Plan for 2020-21). <p>The self-assessment provides an explanation of performance and how it contributed to the performance improvement objective, and the steps that Council intends to take. It is important that Council continues to build on this progress and ensures that it is able to clearly demonstrate achievement of improvement over the coming years. As we noted, the PIP does not always include baselines and this is an area which the Council intends to focus on in 2022-23.</p> <p>The Department for Communities required the Council to publish information collected in relation to statutory performance indicators and standards in relation to planning, economic development and waste management. We reviewed the published information and the Council has:</p> <ul style="list-style-type: none"> • disclosed its 2020-21 performance in relation to its statutory indicators; • included a comparison with previous four years; • provided some explanation and context to performance as well as identifying areas for improvement; and • where appropriate, made performance comparisons against national averages or other councils as these are set across all councils and central government departments report on performance for each council area. <p>Councils are also required to assess performance in relation to any selected self-imposed indicators and standards, in relation to the general duty to improve. Legislation requires the Council to compare its performance for the 2020-21 year to that of previous years and as far as is practicable, report performance against other councils in the exercise of the same or similar functions. The 2020-21 self-assessment reports on a very variety of self-imposed indicators.</p> <p>In terms of these self-imposed indicators, Council has contributed to and used the APSE led National Performance Benchmarking Network. This assisted the Council in improving its ability to compare performance across a wide range of services and activities. However, as the Council has over one hundred self-imposed indicators, Council's performance is limited to a performance grading rating (Good Performance, On-trend Performance or Area for Improvement). The Council may wish to consider focussing on a reduced number of key self-imposed indicators to facilitate a more detailed analysis of performance.</p>

Thematic area	Observations
	<p>The issue of benchmarking with other councils is part of the work plan for the Performance Improvement Working Group and it is expected that progress on this issue will continue to be made to allow a broader range of functions to be compared. However we note that delays to this process were faced as a result of COVID-19.</p>
<p>Demonstrating a track record of improvement</p>	<p>As a result of the COVID-19 pandemic the Department for Communities confirmed in June 2020 that it did not expect Councils to publish a performance plan for the 2020-21 financial year. Despite this the Council still reported on progress against two Objectives which it was carrying forward to 2021-22.</p> <p>The Council disclosed its performance in relation to its statutory indicators: included a comparison with the previous four years; provided some explanation and context to performance; and made performance comparisons against national averages or other councils. Whilst performance has been affected by the pandemic, the Council was able to demonstrate improvement in relation to some statutory performance indicators and standards and performance. Although Planning again fell short of the targets set.</p> <p>Likewise, Council has been able to show some improvement against self-imposed indicators. However, this was the first year that self-imposed indicators focused mainly on APSE led national performance benchmarking, making it difficult to demonstrate a track record of improvement for these new indicators.</p> <p>Although there was some evidence of a track record of improvement, in light of the impact of COVID-19 on Council services we have been unable to place reliance on this trend information, in forming an assessment of whether the Council has discharged its duties under Part 12 of the Act and has acted in accordance with the Department for Communities' guidance sufficiently during 2021-22.</p>