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Mr David Jackson
Chief Executive
Causeway Coast & Glens Council
Cloonavin
66 Portstewart Road
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BT52 1EY

28 November 2019

Dear David,

CAUSEWAY COAST & GLENS COUNCIL:
Section 95 of the Local Government Act 2014

Improvement Audit and Assessment – Audit and Assessment Report

The Local Government Auditor has now certified the improvement audit for the Council with a standard, unqualified opinion. However, the assessment opinion of the Local Government Auditor is that the Council is unlikely to comply with Part 12 of the Local Government Act (Northern Ireland) 2014. I attach a copy of our final audit and assessment report.

The report sets out the findings and conclusions from our work, it includes the audit and assessment certificate as an Annex. I also attach a scanned copy of the original certificate signed by the Local Government Auditor.

This letter and attachments have been copied to the Department for Communities as the legislation requires. I would like to thank you and your staff for the assistance and co-operation we received throughout the audit.

Yours sincerely

Colette Kane
Director

Causeway Coast and Glens Borough Council

Audit and Assessment Report 2019-20

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



28 November 2019

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 the 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 the Council is unlikely to comply with Part 12 of the Local Government Act (Northern Ireland) 2014. |
| Statutory recommendations | The LGA made no statutory recommendations |
| Proposals for improvement | The LGA made two new proposals for improvement |

This report summaries the work of the Local Government Auditor (LGA) on the 2019-20 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 the Causeway Coast and Glens Borough Council (the Council) has discharged its performance improvement and reporting duties, including its assessment of performance for 2018-19 and its 2019-20 improvement plan, and has acted in accordance with the Guidance.

Audit Assessment

The LGA has assessed whether the Causeway Coast and Glens Borough Council (the Council) is unlikely 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'.

As a result of my assessment, I consider the Council is unlikely to discharge its duties under Part 12 of the Act and in accordance with the Department for Communities' guidance sufficiently.

The 2019-20 year was the fourth in which councils were required to implement the performance improvement framework. The Council's arrangements to secure continuous improvement, should by now be well embedded. Whilst the Council strengthened these arrangements in year, it was not possible for me to assess if these arrangements were developed sufficiently to deliver measurable improvements to its services in 2018-19. There were some indications that the Council did demonstrate improvement however the embedding of performance management systems and Council structures is essential going forward. In my opinion the Council is unlikely to comply with Part 12 of the Act during 2019-20.

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.

Audit Findings

During the audit and assessment we identified no issues requiring a formal recommendation under the Act. We made two 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 C and progress on key proposals for improvement raised in prior years, which had not been fully addressed last year, has been noted 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 2020 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.

The total audit fee charged is in line with that set out in our Audit Strategy.

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 the Audit Strategy issued to the Council, the LGA's Code of Audit Practice for Local Government Bodies in Northern Ireland and the Statement of Responsibilities.

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.

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 2020, 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 C.

| Thematic area | Issue | Proposal for improvement |
|---|---|---|
| General Duty | Departmental plans are not agreed until several months after the start of the year. | Annual Service Business Plans should be signed off at the beginning of each financial year. They should identify improvement arrangements and areas for continuous improvement and be regularly reported to relevant Committees. |
| Use of data and information and reporting of performance | A robust and flexible Management Information System (MIS) is needed to: <ul style="list-style-type: none"> • inform budget and target setting; • enable Services to manage and report on performance; | The Council should prioritise the development of its performance management 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 |

| Thematic area | Issue | Proposal for improvement |
|---------------|--|---|
| | <ul style="list-style-type: none"> enable Services and Committee members to challenge what Council does and how it is done. | <p>improvement across all services as well as specifically against Improvement objectives and projects.</p> <p>The Council should consider if Performance Management software could improve the efficiency and effectiveness of collecting, analysing, monitoring and reporting on Performance indicators and measures across all services and functions.</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 2018-19 and its improvement plan for 2019-20 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 2019-20 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

As a result of my assessment, I consider the Council is unlikely to discharge its duties under Part 12 of the Act and in accordance with the Department for Communities' guidance sufficiently.

The 2019-20 year was the fourth in which councils were required to implement the performance improvement framework. The Council's arrangements to secure continuous improvement, should by now be well embedded. Whilst the Council strengthened these arrangements in year, it was not possible for me to assess if these arrangements were developed sufficiently to deliver measurable improvements to its services in 2018-19. There were some indications that the Council did demonstrate improvement however the embedding of performance management systems and Council structures is essential going forward. In my opinion the Council is unlikely to comply with Part 12 of the Act during 2019-20.

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.

PAMELA McCREEDY

Local Government Auditor
Northern Ireland Audit Office
106 University Street
Belfast
BT7 1EU

28 November 2019

Annex B – Follow up of implementation of key prior year proposals for improvement

| Year of report | Reference | Proposal for improvement | Action taken by Council | Status |
|----------------|-----------|--|--|--------------------|
| 2016-17 | 2016/GD1 | Causeway Coast and Glens (CCG) should use service data (or other qualitative data) to support the identification and prioritisation of functions in need of improvement. | <p>Over 2018-19 progress has been made most notably in the ongoing development of the Performance dashboard.</p> <p>The data that has been tracked and presented via the Dashboard has been used to highlight areas in need of improvement for example the work the Dashboard has done to track and highlight staff absenteeism, number of agency staff, agency staff overtime hours, the level and cost of Council debt etc. The result of this can be seen in some of the Performance Improvement Objectives and the Self-Imposed Indicators presented within the 2019-20 PIP.</p> | In progress |
| | 2016/GD3 | Details of the improvement arrangements (the duty and associated responsibilities) should be cascaded down to all staff. | | Implemented |
| 2017-18 | 2017/GD1 | Council should ensure that priority areas selected for improvement are supported by a full range of information, including performance management data from across all Council's functions and services. | | Implemented |
| | 2017/GD2 | CCG should ensure that the decision-making process through which functions are prioritised and selected for improvement is transparent and well documented. | | Implemented |
| 2016-17 | 2016/GA1 | Revise terms of reference for the CP&R and Audit Committees to reflect their scrutiny roles in relation | | Implemented |

| Year of report | Reference | Proposal for improvement | Action taken by Council | Status |
|----------------|-----------|---|---|--------------------|
| | | to Council's performance improvement arrangements. | | |
| | 2016/GA2 | Performance improvement should be included as a standing item on CP&R and Audit Committee agendas. | Performance Improvement featured regularly during 2018-19 at Committee level. | In progress |
| | 2016/GA3 | Members of CP&R and the Audit Committees should be provided with training and support to discharge their Performance Improvement responsibilities | Several members as well as the Performance Team attended the SOLACE led Elected Members Performance Masterclass workshop in January 2019. The Performance Team held a workshop evening with elected members In January 2019 and part of this workshop focused on the roles and responsibilities of members. . Training is planned for all members in October 2019 with a session dedicated to Performance Improvement. | In progress |
| | 2016/GA4 | The Audit Committee should monitor the activity of the other Council Committees charged with the scrutiny of performance improvement. | This will also form part of the consideration for the updated Policy and Audit Committee Terms of Reference. | In progress |
| | 2016/GA5 | The CP&R and Audit Committee members should be provided with appropriate performance improvement documentation to enable them to perform their scrutiny and monitoring functions. | | Implemented |
| 2017-18 | 2017/GA1 | Council needs to ensure that it's Corporate Policy & Resources Committee, other functional committees and the senior management team are subjecting the Council's priorities, improvement objectives, | | Implemented |

| Year of report | Reference | Proposal for improvement | Action taken by Council | Status |
|----------------|-----------|--|-------------------------|--------------------|
| | | activities, projects, risks and performance to appropriate scrutiny, challenge and evaluation. | | |
| | 2017/GA2 | Council should ensure that its officers provide relevant committees with appropriate timely information in relation to the delivery of the improvement objectives. | | Implemented |
| 2016-17 | 2016/IO1 | Objectives do not directly identify the functions that Council intends to improve, instead functions for improvement derive from the 'Performance Improvement projects' identified in respect of each objective. Objectives would be improved by identifying the specific functions or services it intends to improve. | | Implemented |
| | 2016/IO2 | Targets in relation to projects e.g. efficiency related projects, customer engagement and estates strategy projects, should be expressed in outcome terms, rather than merely reflecting their outputs. | | Implemented |
| 2017-18 | 2017/IO1 | Council should avoid improvement objectives that are excessively broad, aspirational and open-ended as they may lack the capability to inform effective action and accountability. Objectives should ideally both describe the overall purpose and the scope of action to deliver it (e.g. "we will provide more and better opportunities for citizens to engage in physical activity"). | | Implemented |
| | 2017/IO2 | Council should ensure that each improvement objective and its underlying projects are focused on outcomes for citizens in relation to improved functions and/or services rather than simply outputs | | Implemented |

| Year of report | Reference | Proposal for improvement | Action taken by Council | Status |
|----------------|-----------|--|--|--------------------|
| | 2017/IO3 | Council should ensure that improvement can be demonstrated at the objective level and, where possible, measured through the use of meaningful performance indicators and data collection and/or other qualitative methods. These indicators should not just concentrate around, nor be limited to, the statutory indicators and standards imposed by central government. | | Implemented |
| | 2017/IO4 | Where possible and relevant, the Council should use baseline performance data/information (and set standards which they hope to achieve) against which future improvement can be demonstrated. | | Implemented |
| 2016-17 | 2016/C1 | Council should raise the profile and transparency of the performance improvement framework throughout the year on the Council's website and other communication channels for example social media, citizen magazines etc. | | Implemented |
| | 2016/C2 | Council should consider other methods of obtaining views (as well as service level feedback) from citizens and organisations, for example, a citizen panel, staff and councillor workshops, and focus groups. | | Implemented |
| | 2016/C3 | Council should consider providing additional discussion points and explaining any specific matters the Council wishes to obtain comment on, or guide consultees to matters they may wish to reflect upon to encourage more meaningful responses. | As noted above the Council took a much wider view this year and offered public, members, senior Councils officers and Community Planning partners an opportunity to shape the development of Objectives and the PIP by reflecting on the themes from last year's consultation and provide commentary on the reasons for their decisions. | In progress |

| Year of report | Reference | Proposal for improvement | Action taken by Council | Status |
|----------------|-----------|--|--|--------------------|
| | 2016/C5 | Consider responses in a timely manner, publish a transparent synopsis of responses (incl a detail on what impact, if any, these had on improvement objectives) to help demonstrate to consultees that their views are being considered. | A formal Consultation Report was published on the Council website alongside the PIP 2019/20. | In progress |
| 2016-17 | 2016/IP1 | Improvement objectives are high level, the plan would benefit from more detail to enhance both transparency and meaningfulness of the Council's commitment to continuously improve its functions. | | Implemented |
| | 2016/IP2 | There is a need for more specific detail on how individual projects address particular objectives and how they provide positive benefits for citizens/ratepayers. | | Implemented |
| | 2016/IP3 | More detail should be provided on how the Council intends to achieve statutory indicators and standards set by central government. | | Implemented |
| | 2016/IP4 | Consideration should be given to wider dissemination of the plan and its contents beyond the Council website, including to staff, through newsletters and other group contacts etc. | References included in citizens newsletter; Consultation and Survey Monkey survey promoted via local newspapers and social Media. Update included in Staff news in Feb 2019. | In progress |
| 2017-18 | 2017/IP2 | The Improvement Plan should include a description of Council's arrangements to exercise its functions so that any applicable statutory performance standards are met, rather than a list of published indicators and standards (section 89(5). | | Implemented |
| 2016-17 | 2016/AI1 | Council should demonstrate the impact of its arrangements for continuous improvement on the outcomes for citizens | To be done corporately through the continuing developing performance management framework and Performance Improvement Policy. | In progress |

| Year of report | Reference | Proposal for improvement | Action taken by Council | Status |
|----------------|-----------|--|---|--------------------|
| | 2016/AI2 | Project plans should be in place for all the performance improvement projects. | <p>This is the responsibility of SRO and senior officers under each Objective. Delivery Plans in place for each Objective and related projects were reviewed.</p> <p>However the quality and robustness varied in format. Across service areas there was the absence of a standard consistent approach to documenting the management arrangements in relation to the conception of and planning delivery of each Improvement Objectives and the associated projects included in the Performance Improvement Plan.</p> | In progress |
| | 2016/AI3 | Performance measurement/data collection arrangements should be in place for all projects at the start of the year | | Implemented |
| | 2016/AI4 | There is little evidence of regular scrutiny and monitoring of the progress against improvement objectives and targets. | | Implemented |
| 2017-18 | 2017/AI1 | Council has no established baselines from which to measure improvement and it does not yet have a track record of improvement. | <p>The Performance Dashboard is being used as a tool to drive data collection and awareness of areas in need of improvement.</p> <p>Baselines, where applicable, are listed for the projects with the Objectives of the PIP 2019-20 and also for the self-imposed indicators.</p> | In progress |

| Year of report | Reference | Proposal for improvement | Action taken by Council | Status |
|----------------|-----------|--|---|--------------------|
| 2016-17 | 2016/PR1 | The Council should consider including performance reporting against statutory indicators and standards as a standing item for relevant Committees. | Performance officer provided updates on all statutory indicators to CPR and Audit committee on a quarterly basis. | In progress |
| | 2016/PR2 | Officers should initiate a process to identify key performance indicators. | As above | In progress |
| 2017-18 | 2017/PR1 | Council should select a range of local indicators and standards to enable it to measure and monitor improvement across its full range of functions, as part of its general duty arrangements to continuously improve. This information should be included in the published self-assessment and provide year on year comparisons. | This year in the PIP 2019-20 Council has identified a suite of self-imposed indicators. These have been drawn from an analysis of service level and Dashboard performance information. These will be reported on quarterly along with the Objectives and will remain as part of the suite of Dashboard measures. | In progress |
| | 2017/PR2 | Council should ensure that a performance management framework should be established and embedded across all Council's functions. | As above | In progress |
| | 2017/PR3 | Council should continue working with other councils and the Department to agree a suite of self-imposed indicators and standards. This will enable meaningful comparisons to be made and published in line with its statutory responsibility. | <p>A sub-group of SOLACE's performance improvement working group has produced a paper on the way forward to establish a regional performance framework (benchmark framework). The approach will be agreed with the Department of Communities. A meeting of the sub-group discussed the issue in November 2019.</p> <p>Some progress has been made in the current year following advice from the Department of Communities that councils should benchmark at least two self-imposed indicators relating to the general duty to improve in addition to benchmarking the statutory indicators. The Council</p> | In progress |

| Year of report | Reference | Proposal for improvement | Action taken by Council | Status |
|----------------|------------|--|---|--------------------|
| | | | <p>has benchmarked these indicators against the other councils within the annual assessment report 2018-19.</p> <p>Significant progress by all councils is essential in the coming year to allow a broader range of functions to be compared.</p> | |
| | 2017/PR4 | Self-assessment reports must include a section on performance in relation to its general duty to improve as required under the legislation | | Implemented |
| | 2017/PR5 | Self-assessments should not focus solely on the underlying projects, but also include an assessment of the Council's progress in delivering its improvement objectives. | The extent to which the Council felt improvement objectives have been achieved is listed in the self-assessment. However, importantly the Council appreciates that the focus of the 2018-19 Performance Improvement Plan was too output focused with not enough aims, baselines, targets, and indicators that are outcomes focused. Based on the inherent limitations of the objectives previously set as reported on last year it was not always possible for the Council to report on performance at the overall objective level outcomes and not just outputs. | In progress |
| | 2018 PPI 1 | The Self-Assessment report should not focus solely on results, it should include explanations why targets were not met (if applicable) and what steps the Council intends to take to address the issue moving forward. This provides | Whilst there were limitations in what it was possible to report on in 2018-19 the Council did try and provide some detail around areas of underperformance. For example performance against Planning indicators was been shown to be below target and an action plan is in place to try | In Progress |

| Year of report | Reference | Proposal for improvement | Action taken by Council | Status |
|----------------|-----------|--|---|--------------------|
| | | context and background for a reader of the review | and address this. This is expected to develop further in the 2019-20 report. | |
| | 2018 PPI2 | Independent verification of the results of self-imposed standards or projects should be undertaken prior to their publication in the Self-Assessment report. | There remain issues around the need to independently verify and validate figures prior to publication. The Council's internal auditors have considered the area of Improvement for a couple of years and reported on weaknesses which need to be addressed. The latest report focused on progress against Improvement Objectives. The internal audit report is due in November 2019. The Council should consider what assurance it has on the validity of performance data and consider whether there is a potential role for internal audit to independently assess KPIs and validate performance data. | In progress |
| 2018 | Various | The Council should prioritise prior year proposals for improvement and take steps to incorporate them into the 2018-19 performance improvement cycle. | Of 41 prior year proposals for improvement, 22 have now been implemented. | In progress |

Annex C – Detailed observations

| Thematic area | Observations |
|---------------------------------------|---|
| <p>General duty to improve</p> | <p>The Council has made significant progress from last year with regards to putting arrangements in place to secure continuous improvement in the exercise of its functions in order to achieve its General Duty to Improve as well as select Improvement Objectives. It recognises that more needs to be done and is looking to further develop and formalise processes and standardise documentation around plans for the delivery of each Improvements Objectives and projects and to monitor and report on progress and performance. The arrangements have been included in the PIP.</p> <p>The process continues to be developed and our previous Proposals for Improvement are being acted upon. Most notably a Performance Dashboard continues to be developed, policies and terms of reference have been reviewed.</p> <p>Further use is being made of service performance data (and other qualitative data) to measure the performance of its functions which helped to inform decision making in respect of its identification of improvement priorities such as absenteeism, council debt and agency workers. Senior Officers are becoming more involved in the development and shaping of objectives although this needs further development. Transparency around the process by which services are prioritised and specific projects for improvement selected could be further improved and refined.</p> <p>The governance arrangements for monitoring progress towards improvement are documented and published within the PIP plan. The Performance Improvement Officer continues to develop a Performance Reporting Dashboard and reports to support this across all Council services and functions.</p> <p>As KPIs continue to be developed across all services the use of Performance Management Software could improve the efficiency and effectiveness of monitoring and reporting on Performance and Budgets across all services and functions.</p> <p>A sub-group of SOLACE’s performance improvement working group has produced a paper on the way forward to establish a regional performance framework (benchmark framework). The approach will be agreed with the Department of Communities. A meeting of the sub-group discussed the issue in November 2019.</p> <p>Some progress has been made in the current year following advice from the Department of Communities that councils should benchmark at least two self-imposed indicators relating to the general duty to improve in addition to benchmarking the statutory indicators. The Council has benchmarked these indicators against the other councils within</p> |

| Thematic area | Observations |
|---------------------------------------|--|
| | <p>the annual assessment report 2018-19. We expect that further progress by all councils will be necessary in the coming year to allow a broader range of functions to be compared.</p> |
| <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 and evaluation. To this end, senior officers must provide appropriate and timely information in relation to the delivery of the improvement objectives.</p> <p>The Performance Improvement Policy, which reflects the revised Governance arrangements, approved in March 2018 described how the Council intended to implement its Improvement responsibilities and how performance management was to be embedded across the Council. However this system of governance was not actually operating within the Council as fully intended. Action has now been taken on previous Proposals for Improvement but more remains to be done as all have not yet been completed and will need to be bedded in. The Council's Performance Improvement Policy is under review and a draft has been considered by Councillors who made several recommendations as to how CCG can improve their Performance Improvement Framework and Reporting mechanisms. In addition, the Terms of Reference for both the CP&R Committee and the Audit Committee are being revised and reviewed by the Council's Governance Working Group. These are due to be presented to the newly elected members for consideration in December 2019.</p> <p>Historically a low level of resource had been applied to Performance Improvement area in the Council and little progress made in implementing proposals for improvement or embedding arrangements. Over the last year the Council increased its investment in this area and there has been much progress in developing, establishing and applying governance arrangements.</p> <p>The following arrangements are now in place and are starting to operate more consistently:</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. • A Performance Dashboard has been put in place with performance measures and indicators of activity all across the work of Council. The format and level of detail included continues to be further developed. This update is taken to the Council's Corporate Policy and Resources Committee (C&PR) and the Audit Committee on a quarterly basis. |

| Thematic area | Observations |
|-------------------------------|--|
| | <ul style="list-style-type: none"> • The Council`s internal Auditors undertake a six monthly audit in relation to progress of work being undertaken on the annual performance improvement plan and report performance to the Audit Committee <p>Senior Management and Heads of Service are increasingly involved in the identification and development of Improvement Objectives and self-imposed indicators and in collecting and reporting information on progress. 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. The Dashboard has already been used to highlight areas in need of improvement such as staff absenteeism, number of agency staff, agency staff overtime hours, the level and cost of Council debt etc. The provision of regular performance updates and information through the Dashboard is enabling the CP&R Committee and Audit Committee to play a stronger role in scrutinising and monitoring performance improvement.</p> |
| Improvement objectives | <p>The Council published its Performance Improvement Plan in June 2019 which included four improvement objectives and two long term Improvement Objectives. It also includes a new suite of self-imposed measures and the Statutory Indicators.</p> <p>The Objectives fit strategically with the 2017-2032 Community Planning and the Council has established arrangements to deliver projects and actions to deliver against improvement objectives.</p> <p>Each improvement objective sets out:</p> <ul style="list-style-type: none"> • the link to the Community Plan, the seven aspects of Improvement, and Corporate Plan 2015-19 • the Senior Responsible Officer; • why the objective was chosen; • outputs - what they will do in terms of projects and actions; • what improvements citizens are likely to see moving forward • outcomes - how they will measure success including baselines and targets where available; <p>The Council has taken action on our previous proposals for improvement on developing Improvement Objectives which are more specific, outcomes focused and achievable. As a result this meant that the prior year Objectives have been</p> |

| Thematic area | Observations |
|---------------------|--|
| | <p>replaced although the new 2019-20 Improvement Objectives will in some areas focus on improvement activity within the same theme.</p> <p>Given the new direction taken by the Council, whilst significant progress has been made arrangements and processes are not yet mature and all relevant baseline data or information against which future improvement can be demonstrated or measured, at an objective and project level, is not yet always available. Successful agreement and implementation of these projects and embedding these arrangements throughout all council services will be critical to identifying areas for improvement and then in measuring, monitoring, and reporting future progress. The Council is currently developing templates for Objectives and Projects to ensure that planning, monitoring and management arrangements are clear and quality consistent across the Council. It is important that these are fully embedded across services.</p> |
| Consultation | <p>Cognisance was taken of previous proposals for improvement and CCG acted to improve upon previous year consultation exercises and to raise the public profile of the concept of performance improvement along with ways to improve the consultation process and encouraging more citizens and stakeholders to participate. For example it used a number of promotion methods such as: Citizens newsletter in Spring 2019; Facebook posts; Consultation and Survey Monkey survey promoted via local newspapers and Facebook; Update included in Staff news in Feb 2019.</p> <p>In addition consultation responses were reported in the Performance Improvement plan and also a formal Consultation Report was published on the Council website alongside the PIP 2019-20.</p> <p>Consultation did take place with public, members, senior Councils officers and Community Planning partners which was gave them an opportunity to reflect on the themes from last year's and to assist in the development of its Performance Improvement Objectives for 2019-20. This was a good first step and in line with guidance and best practice. In addition a consultation report was placed on website.</p> <p>Following this early consultation Performance Improvement Objectives for 2019-20 were then set in the context of a performance improvement plan 2019-20 which was later published and put on website but not specifically consulted on. However, whilst the Council can demonstrate that it consulted on its general duty to improve as part of a wider assessment of the "needs" of the community it did not specifically consult on the Objectives themselves, which it had previously.</p> |

| Thematic area | Observations |
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| <p>Improvement plan</p> | <p>The Improvement Plan was published on time in June 2019 and meets the requirements of legislation. It also benefits from more detail enhancing the transparency and meaningfulness of the Council's commitment to continuously improve its functions.</p> <p>It is available in electronic format on the Council's website and on contact with the Council.</p> <p>Proposals for Improvement from previous years have been acted upon and issues with the publication addressed. For example:</p> <ul style="list-style-type: none"> • information provided in relation to how the Council intends to achieve its statutory indicators and standards; • detail on how the individual projects address particular objectives and how they provide positive benefits for citizens/ratepayers; • detail as to how the Council intends to achieve statutory indicators and standards set by central government; • descriptions of the Council's arrangements to secure continuous improvement in the exercise of its functions (section 84 (1)); and of its arrangements to exercise its functions so that any applicable statutory performance standards are met; and • a rationale within its improvement plan for prior year improvement objectives which have not been brought forward. <p>As noted above Improvement Objectives included in the Plan are clearer, less strategic and aspirational and now more directly aligned to identifiable outputs which can be related to Community Plan and Council's Corporate Strategy.</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 from last year with regards putting arrangements in place to secure continuous improvement in the exercise of its functions in order to achieve its General Duty to Improve as well as select</p> |

| Thematic area | Observations |
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| | <p>Improvement Objectives. Our previous Proposals for Improvement have been acted upon and Senior Officers are becoming more involved in the development and shaping of objectives.</p> <p>For example: more use being made of service performance data (and other qualitative data) to measure the performance of its functions; more transparency around the process by which services are prioritised and specific projects for improvement selected could be further improved and refined; further development of KPIs across all Council services and functions; further use and development of the Performance Reporting Dashboard and reports on performance overtime.</p> <p>Progress has been made and 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 lines of accountability to senior management and members.</p> <p>However, documentation and arrangements vary so arrangements for delivery of projects is not always clear and transparent and the level of detail and quality is not consistent across all services. These need to become established and mature and there is a need to further develop and formalise and standardise processes and documentation around identification and selection of Improvement Objectives and projects, the plans for delivery of each Improvement Objectives and projects, and the monitoring and reporting on progress and performance.</p> <p>The use of Performance Management Software could improve the efficiency and effectiveness of monitoring and reporting on Performance and Budgets across all services and functions.</p> |
| <p>Collection, use and publication of performance information</p> | <p>CCG has taken action in response to our previous proposals for improvement. The Council's 2018-19 Performance Improvement 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 requirements:</p> <ul style="list-style-type: none"> • Performance improvement objectives set out in the 2018-2019 Performance Improvement Plan; • Statutory performance improvement indicators and standards for the functions of Economic Development, Planning and Waste for 2018-2019, including comparison with the previous two years; and • Performance information on self-imposed indicators and standards collected during 2018-2019. |

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| | <p>The publication of this information fulfils in part the Council’s statutory requirement under Part 12, Section 92 of the Act.</p> <p>It is important that some independent verification of the results of self-imposed standards or projects should be undertaken prior to their publication in the Self-Assessment report.</p> <p>The Council appreciates that the focus of the 2018-19 Performance Improvement Plan was too Output focused with not enough aims and indicators that were Outcomes focused. This is something which Council has sought to address and can be evidenced in the 2019-20 Performance Improvement Plan as well as continuing efforts to develop a more standardised and robust Improvement framework. Based on their new Objectives if the Council implement in full the previous ‘<i>Proposals for Improvement</i>’ they will improve transparency and clarity of future assessments to the citizen:</p> <ul style="list-style-type: none"> • Any self-assessment review should outline any reasons why objectives or projects are not delivering improvement and what steps the Council intends to take to remedy the situation. This provides context and background for a reader of the review • the primary focus of the Council’s overall view of its success in achieving its improvement objectives for the year must be on the actual ‘outcomes’ achieved. In particular, the actual improvement to functions or services arising as a result of delivering a project, rather than on ‘outputs’ measures such as progress made in delivering a specific project against milestones or deliverables. • consistent reporting on the extent of any improvement to local services or functions resulting. For example, improvement measured against the baseline position established in the improvement plan, the anticipated level of improvement hoped for, improvement achieved over more than one year, and whether the Improvement Objective and/or associated Improvement project is carried forward to the following Improvement plan. |
| <p>Demonstrating a track record of improvement</p> | <p>In some areas the Council has demonstrated a track record of performance improvement however in order to sustain and further improve Council will require an investment of resources.</p> <p>The Council was able to demonstrate some improvement in relation to statutory performance indicators and standards relating to the functional areas of planning, economic development and waste management. The Council disclosed its 2018-19 performance in relation to its statutory indicators; included a comparison across three years; provided some explanation and context to performance; and made performance comparisons against national averages or to the other councils.</p> <p>Likewise, against self-imposed indicators it has been able to show some improvement. Whilst the 2018-19 Performance Improvement Plan had no specific or formal inclusion of self-imposed indicators relating to the General Duty to Improve,</p> |

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| | <p>this has been addressed, and a new suite of self-imposed indicators has been included in the 2019-20 Performance Improvement Plan. In addition, the Council for 2018-19 included in-year and year on year performance figures against several self-imposed indicators and where possible compared against other Councils. Comparison was made based on data available in the public domain in relation to Absence and Prompt payments across a number of years.</p> |

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 2018-19 and its improvement plan for 2019-20 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 2019-20 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

As a result of my assessment, I consider the Council is unlikely to discharge its duties under Part 12 of the Act and in accordance with the Department for Communities' guidance sufficiently.

The 2019-20 year was the fourth in which councils were required to implement the performance improvement framework. The Council's arrangements to secure continuous improvement, should by now be well embedded. Whilst the Council strengthened these arrangements in year, it was not possible for me to assess if these arrangements were developed sufficiently to deliver measurable improvements to its services in 2018-19. There were some indications that the Council did demonstrate improvement however the embedding of performance management systems and Council structures is essential going forward. In my opinion the Council is unlikely to comply with Part 12 of the Act during 2019-20.

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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28 November 2019