

Audit and Assessment Report 2022-23

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

Causeway Coast and Glens Borough Council

X November 2022

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We have prepared this report for Causeway Coast and Glens Borough Council's and the Department for Communities' sole use. 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 Council is likely to comply with Part 12 of the Local Government Act (Northern Ireland) 2014 (the Act) during 2022-23
Statutory recommendations	The LGA made no statutory recommendations
Proposals for improvement	The LGA made four new proposals for improvement

This report summaries the work of the Local Government Auditor (LGA) on the 2022-23 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 2021-22 and

its 2022-23 improvement plan, and has acted in accordance with the Guidance.

Audit Assessment

The LGA is required to assess 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'.

Councils continue to operate in a challenging environment with focus on recovery from the Covid-19 pandemic and the ongoing cost of living crisis, impacting both on performance and the way in which services are delivered. This changing landscape and refocusing of priorities has impacted on the ability to rely on past trends in councils' performance to assess the likelihood of future compliance with Part 12 of the Act. In light of this, the LGA has concluded that she is unable to reach an opinion on whether the Council is likely to have complied with its performance improvement responsibilities for 2022-23.

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 four 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 31 March 2023 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.

Other matters

Sustainability and Climate Change

Councils have begun to address the issue of climate change and sustainability, with individual councils at varying stages of progress. If councils are to link climate change and sustainable action to their performance objectives or even as part of their wider continuous improvement arrangements in future years, it will be necessary to consider arrangements to improve, including ensuring adequate resourcing and gathering of accurate data.

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 31 March 2023, 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.

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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	During the year, the Council further developed its electronic performance reporting system. However, the system is currently used by a limited number of staff. It is important that the system is utilised across all Council service areas in order for the full benefits of this system to be realised.	Council should ensure that the relevant departments utilise the full functionality of the performance system. Efficiencies in the reporting process will be realised if staff are appropriately trained and engaged with the process.

Governance Arrangements	Performance Improvement is not a standing agenda item for meetings of the Corporate Policy & Resources (CP&R) Committee. In addition, although the CP&R Committee takes the lead in terms of scrutiny, reporting and overseeing the annual Performance Improvement Plans and Self-Assessment documents, its role and responsibilities for this activity are not formally documented.	The roles and responsibilities of the CP&R Committee in respect of performance improvement should be formalised, with performance improvement a standing agenda item for CP&R meetings to ensure that performance is monitored and any corrective action taken on a timely basis.
Governance Arrangements	The Council's current Performance Improvement policy is dated March 2018. An updated policy has been drafted but this has yet to be reviewed and approved.	The Council should review and approve the updated Performance Improvement policy so that the approved policy reflects current arrangements.
General Duty	<p>The Council has identified a significant number (114) of self-imposed indicators to measure progress in various areas of work across the Council. The outcomes for these indicators are included within the 2021-22 self-assessment report.</p> <p>Whilst there is a comparison of 2021-22 outcomes with those for 2020-21 and to Local Authority averages, no specific targets have been set by the Council for these indicators.</p>	Whilst the development of benchmarking data is a positive step forward, Council should consider this further and refine the process for reporting this information, ensuring that, where appropriate, targets are set for self-imposed indicators and that the action(s) needed to improve performance are identified and documented.

	<p>The Council classifies outcomes as “good performance”, “on-trend performance” or “area for improvement.” Although six indicators have been classified as an “area for improvement”, no details are provided to indicate what improvements are necessary or will be made.</p>	
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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 2021-22 and its improvement plan for 2022-23 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 2022-23 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

Councils continue to operate in a challenging environment with focus on recovery from the Covid-19 pandemic and the ongoing cost of living crisis, impacting both on performance and the way in which services are delivered. This changing landscape and refocusing of priorities has impacted my ability to rely on past trends in councils' performance to assess the likelihood of future compliance with Part 12 of the Act. In light of this, I am unable to reach an opinion on whether the Council is likely to discharge its duties under Part 12 of the Act and act in accordance with the Department for Communities' guidance sufficiently during 2022-23.

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.

Colette Kane
Local Government Auditor
Northern Ireland Audit Office
106 University Street
BELFAST
BT7 1EU

X November 2022

Annex B – Detailed observations

Thematic area	Observations
General duty to improve	<p>Council has continued to make progress with putting arrangements in place to secure continuous improvement in order to achieve its general duty to improve. The Council continues to develop and grow a culture of performance improvement and reporting within its corporate structures and across all council services and functions. Whilst there has been good progress there is more to do in terms of development and formalisation of processes and standardisation of relevant documentation around improvement objectives, projects and monitoring reports.</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>Key performance indicators continue to be developed across all services and there has been further developments in relation to the use of the PERFORM Performance Management software. This should continue to improve the efficiency and effectiveness of monitoring and reporting on performance and budgets across all services and functions. However, Council should encourage all relevant departments to use the system. A proposal for improvement has been raised in Section 3.</p>
Governance arrangements	<p>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>

Thematic area	Observations
	<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>We noted that CP&R Committee’s role and responsibilities in relation to performance improvement are not formally documented. In addition, although regularly discussed, performance improvement is not a standing agenda item for CP&R Committee meeting. A proposal for improvement has been raised in Section 3.</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 continue to further develop and embed improvements to Council’s Performance Improvement and Business Planning processes and an objective relating to this is included in the Performance Improvement Plan. 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 across the work of Council. The format and level of detail included continues to be further developed.

Thematic area	Observations
	<ul style="list-style-type: none"> 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>The Council Performance Improvement policy which was last approved in March 2018. A new policy has been drafted but this has yet to be reviewed or approved. A proposal for improvement has been raised in Section 3.</p>
Improvement objectives	<p>The 2022-23 Performance Improvement Plan (PIP) was published in June 2022. 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 2022-23 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. It is evident that Council has developed performance improvement objectives that are now more specific, achievable and in most cases better aligned to outcomes rather than</p>

Thematic area	Observations
	<p>simply outputs. However, this is an area Council should continue to refine as it develops objectives.</p>
Consultation	<p>The first stage of consultation with citizens was the rollout of Causeway Coast and Glens Council's first ever Citizens Survey. The Citizen's Survey was opened on 24 November 2021 and closed on 7 January 2022. An invitation leaflet to take part was delivered to every domestic address in the Borough. A promotional video was developed and issued through Council's social media channels and local press and media were also utilised. Council received 2,268 responses in total, with a completion rate of 82%.</p> <p>The second stage of consultation was formulated around some more specific Improvement Plan related topics. As such Council published an online survey asking citizens for their opinions on the Performance Improvement Objectives. This exercise opened on 13 April 2022 and closed on 30 July 2022. Views were sought via an online survey, social media, staff newsletter and the Council web site. Council received 59 responses including over 200 separate comments.</p> <p>Council produced a consultation report and considered the results of the consultation in the formulation of objectives and outcomes.</p>
Improvement plan	<p>Council published its PIP on time on 30 June 2022 and it meets the requirements of legislation.</p> <p>The PIP now includes details on:</p> <ul style="list-style-type: none"> • arrangements and further arrangements to discharge Council's general duty to improve;

Thematic area	Observations
	<ul style="list-style-type: none"> • 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 2022-23 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 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>
Arrangements to improve	<p>Council has adequate arrangements in place to support delivery and potential achievement of its improvement objectives.</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 three/four years with regards putting arrangements in place to secure continuous improvement in the exercise of its</p>

Thematic area	Observations
	<p>functions in order to achieve its general duty to improve as well as select improvement objectives. Senior officers are 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>More use is being made of service performance data (and other qualitative data) to measure the performance of its functions. However, further use and development of the performance management software PERFORM should improve the efficiency and effectiveness of monitoring and reporting on performance and budgets across all services and functions. A proposal for improvement has been raised in Section 3.</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 lines of accountability to senior management and members.</p> <p>There is still the need for arrangements around documentation to become established and mature, and 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 objective and project; and the monitoring and reporting on progress and performance.</p>
Collection, use and publication of performance information	Council's 2021-22 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 also sets out an assessment of the Council's performance against the following:

Thematic area	Observations
	<ul style="list-style-type: none"> • Statutory performance indicators and standards for the functions of economic development, planning and waste for 2021-22 including comparison with previous five years; • Performance information on self-imposed indicators and standards collected during 2021-22; and • Performance information on 21-22 improvement objectives <p>The self-assessment provides an explanation of performance and how it contributed to the performance improvement objectives, 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.</p> <p>We reviewed the published information and the Council has:</p> <ul style="list-style-type: none"> • disclosed its 2021-22 performance in relation to its statutory indicators; • included a comparison with previous five 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 2021-22 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 2021-22 self-assessment reports on a variety of self-imposed indicators.</p>

Thematic area	Observations
	<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, no specific targets have been set by the Council for these self-imposed indicators and where outcomes have been classified as an “area for improvement” no details are provided to indicate what improvement are necessary or will be made. A proposal for improvement has been raised in Section 3.</p> <p>The issue of benchmarking with other councils is also part of the work plan for the Performance Improvement Working Group (PIWG) and it is expected that progress on this issue will be made to allow a broader range of activities to be compared. However, we note that delays to this process were faced because of the COVID-19 pandemic and while there was an intention to take this issue forward through the PIWG, limited progress has been made on this matter.</p> <p>The figure published for one self-imposed indicator (absenteeism) was incorrect, while the narrative for one of the statutory waste indicators did not reflect the actual result in 2021-22.</p>
<p>Demonstrating a track record of improvement</p>	<p>The LGA has concluded that the changing landscape and refocusing of priorities has impacted on her ability to rely on past trends in councils’ performance to assess the likelihood of future compliance with Part 12 of the Act. Services have been affected by the impact of COVID-19 and cost of living crisis.</p> <p>Council has disclosed its performance in relation to its statutory indicators and included a comparison with the previous four years along with some explanation and context to performance and made performance comparisons against national averages or other councils.</p>

Thematic area	Observations
	<p>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 only the second 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>

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