



WALES **AUDIT** OFFICE
SWYDDFA **ARCHWILIO** CYMRU

Annual Improvement Report

Denbighshire

County Council

January 2011



Annual Improvement Report by the Auditor General for Wales

This report is written by the Wales Audit Office on behalf of the Auditor General for Wales. (An explanation of what the Auditor General does is at Appendix 1). It is a new report that he is required to publish about how well Welsh councils are improving their services. With help from other inspectors like Estyn (for education) and the Care and Social Services Inspectorate for Wales, we have brought together a picture of what the council is trying to achieve; how it is going about it; and what it needs to do to improve its approach to improving services.

This Annual Improvement Report sets out that picture and each year we will produce a report to let you know what progress Denbighshire County Council (the Council) has made. We have not covered all the services the Council provides. We have focused on a small number of things, especially those things that the Council has said are its priorities for improvement. The report reflects the position at the end of October 2010 (unless otherwise stated).

We want to find out what you think of the services the Council is providing in your area and will be giving you an opportunity to comment in the future. In the meantime we would like to know whether this report gives you the information you need, and whether it is easy to understand. You can let us know your views by emailing us at info@wao.gov.uk or writing to us at 24, Cathedral Road, Cardiff CF11 9LJ.

The Wales Audit Office study team that assisted in preparing this report comprised Stephen Martin and Karen Lees under the direction of Alan Morris.

This report has been prepared by the Wales Audit Office on behalf of the Auditor General for Wales as required by the Local Government (Wales) Measure 2009. The Auditor General for Wales assesses the compliance of Welsh improvement authorities (county councils, county borough councils, national park authorities and fire and rescue authorities) with the improvement requirements of Part 1 of the Local Government (Wales) Measure 2009.

The Auditor General for Wales and his staff together comprise the Wales Audit Office. For further information about the Wales Audit Office please write to the Auditor General at 24 Cathedral Road, Cardiff, CF11 9LJ. Telephone 029 2032 0500, email: info@wao.gov.uk, or see website www.wao.gov.uk.

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Contents

What kind of area is Denbighshire?	04
Is Denbighshire County Council well managed?	05
Does Denbighshire County Council know what it needs to do to improve?	07
Is Denbighshire County Council serving people well?	08
Is Denbighshire County Council supporting people in need?	09
Is Denbighshire County Council helping people to develop?	12
Is Denbighshire County Council helping to create a safe, prosperous and pleasant place to live?	14
What should the Council do?	19

Appendices

Appendix 1 - About the Auditor General for Wales and this report	20
Appendix 2 - Useful information about Denbighshire and Denbighshire County Council	22
Appendix 3 - The Auditor General's Corporate Assessment	23
Appendix 4 - Appointed Auditor's Annual Letter to the Members of Denbighshire County Council	24
Appendix 5 - Denbighshire County Council's improvement objectives and plans	26
Appendix 6 - References	30

What kind of area is Denbighshire?

Background information

1 It is helpful to understand the kind of area Denbighshire is and some of the challenges it faces. We have included some background information below and at the start of several sections in this report. Further information about Denbighshire and the Council is included in **Appendix 2:**

- Denbighshire is a diverse county with a mixture of urban and rural communities. It has a population of 97,732, and over 60 per cent of the population lives in the seaside towns of Rhyl and Prestatyn¹. The population is increasing by about one per cent every year which is one of the highest rates in Wales. The proportion of children and young people aged 0 to 25 in Denbighshire is one of the lowest of the 22 local authorities in Wales whilst the proportion of people aged 65 and over is one of the highest.
- The proportion of people who speak Welsh in Denbighshire is higher than average. Overall, 31.5 per cent of the population can speak, read and write Welsh compared with 25.6 per cent across Wales. Whilst only 25 per cent of people in Denbighshire's coastal areas speak Welsh, more than 60 per cent speak Welsh in the more rural communities.
- Most parts of Denbighshire are more affluent than the average for Wales. However, the areas of Rhyl West and Rhyl South West are within the top 50 most deprived wards in Wales².

- There are no heavy industrial sites in the county although most of the towns have small industrial parks or estates for light industry. Most of the economy of the area is based on agriculture and tourism.

population
97,732
//////////

welsh speakers
31.5%
//////////

¹ Population as of the latest mid-year estimate (2009).

² 2008 Indices.

Is Denbighshire County Council well managed?

- 2 **Good leadership is driving change, making Denbighshire County Council well placed to deliver better outcomes despite current weaknesses in some arrangements.** This was the overall conclusion of a report the Wales Audit Office produced in July 2010 called the *Preliminary Corporate Assessment* which gives some detail on how the Council is organised and managed. Our findings are set out in [Appendix 3](#). If you want to read the whole *Corporate Assessment Report* you can find it on the Council's website, www.denbighshire.gov.uk or on the Wales Audit Office's website at www.wao.gov.uk.
- 3 The report found that the Council is likely to improve things for people who live in Denbighshire because good leadership is now changing the way the Council is managed for the better. It said that the Council has recovered from a turbulent period which had included critical reports by Estyn and the Wales Audit Office in 2007 and 2008 and the appointment by the Assembly Government of an External Reference Group and also an Independent Education Recovery Board.
- 4 The key messages from the report were that the Council's leadership is good and is making a difference. The Council is doing its best to work in partnership with others. It has got better at stating clear priorities and policies and is changing the way that it plans and reports on progress. However, there are weaknesses in how the Council manages its staff but it is working to improve this. The Council manages its funds reasonably well but needs to do more to make sure it plans to get the best use of its funding and the buildings and land it owns.
- 5 Since that report was produced in the summer, there have been some developments in the Council, but the overall conclusions we have noted in the above paragraphs are still relevant. Some of the developments include:
 - Residents, community groups and partners have been invited to join 'the Big Debate' about where the Council and other public services should be cutting, spending or services – or where they should be concentrating efforts to ensure residents get the services they want.
 - The Council delivers a range of services and activities through partnerships with other councils and organisations. Recently, it has set out the principles for how it should work in future with other councils and organisations in a 'Statement on Collaboration'. The Council is looking to collaborate where it would help to bring about improvement. It is leading work to develop a pan-North Wales School Improvement Service. The Council is working with Conwy County Council to bring their service planning and review in line and to take a collaborative approach to performance management and other arrangements. This has the potential to make collaboration easier.
 - The Council has a 'Change Programme' that aims to improve the efficiency of its in-house services such as Human Resources and legal services. This Change Programme has been updated and the service reviews should be completed by March 2011. Through this work, the Council intends to reduce the cost of its support services by 20 per cent. Senior officers and councillors have carried out 'Service Performance Reviews' on several service areas to develop a better understanding of how well they are doing, and how they can continue to get better.

- 6 Since we produced the Corporate Assessment report the pressure has grown on all public services to make the very best use of all their resources. Revenue funding is the money that councils spend running and managing their services. The Council will see a reduction of around £2.3 million (1.6 per cent) in the revenue funding it gets from the Assembly Government for 2011-12. Once inflation is factored in, that means a real terms cut of around £4.9 million (3.5 per cent). Indicative Assembly Government figures show real terms reductions in the Council's revenue funding for 2012-13 and 2013-14.
- 7 The Council has been aware for some time that it needs to scale back on what it is doing and make sure it uses the resources it has as effectively as possible. It is developing a programme of action to achieve savings and introduce greater efficiency. After allowing for the impact of inflation, service pressures and the need to borrow to fund capital schemes, the Council is aiming to achieve savings of up to £6 million in 2011-12 and further savings of up to £5 million for each for the following three years.
- 8 Capital funding is the money that councils spend on infrastructure, for example new buildings and new equipment. The capital funding available to the Council is set to reduce considerably. Because councils make bids for capital funding, it is not possible to be entirely clear about how much each council will get. The total sum of capital available to councils will fall by 14 per cent in 2011-12 (a real terms cut of 18.5 per cent). There are no official figures for local government capital spending beyond 2011-12 but it is likely to be in line with a general reduction in the Assembly Government's capital spending, which will be cut by around 34 per cent (around 40 per cent in real terms) between 2010-11 and 2013-14.
- 9 The Council has drawn up plans to respond to the 'areas for development' that were identified in our Preliminary Corporate Assessment and also to recommendations made by a Peer Review relating to how the Council uses its resources, which was carried out by a team from the Welsh Local Government Association. The financial auditor appointed by the Auditor General has issued an unqualified audit opinion on the accounting statements, confirming that they present a true and fair view of the Council's financial transactions. His Annual Audit Letter, which provides information regarding the accounts, use of resources and the Council's Improvement Plan is included in this report as [Appendix 4](#).
- 10 There is more information about the right to see Council accounts in the Wales Audit Office leaflet, *Council accounts: your rights*, which you can find on our website at www.wao.gov.uk.

Does Denbighshire County Council know what it needs to do to improve?

- 11 **The Council has a clear set of priorities and plans to achieve its overall aim to improve and become 'A High Performing Council Closer to the Community'. These meet the requirements of the Assembly Government.**
- 12 The Assembly Government requires all councils to publish plans for improving services. Councils must also publish a list of the main priorities that they are aiming to improve each year.
- 13 The Council published its Corporate Plan 2009-12 in July 2009 setting out the main areas where it wants to improve and how it intends to become 'A High Performing Council Closer to the Community'. The plan set out the Council's four overall priorities, which are:
 - adapting service delivery to address demographic changes (in other words altering services to meet the changing needs of the population);
 - reducing deprivation and growing Denbighshire's economy sustainably by strategically targeting resources (in other words making the area more prosperous by using council resources in a targeted way);
 - modernising the education service to achieve a high level of performance across the county; and
 - securing a sustainable road network and flood defences.
- 14 The Corporate Plan also includes four 'improvement themes' which show how it wants to improve the way it is run. These have now been brought together as a fifth priority 'improving the way the Council works'.
- 15 In May 2010 the Council published an updated plan called 'Delivering the Corporate Plan 2010-11' which sets out what it intends to do this year.
- 16 The plans and the priorities meet the requirements of the Assembly Government and follow the guidance that has been issued. The priorities address relevant areas of concern for the county, plans are well written and in most cases the Council will be able to measure improvement. The Council could have done more to involve others in working out the priorities and in a few cases needs to do more to be able to show how people will be better off as a result of the Council's work. Further details about the plans and policies are in [Appendix 5](#).

Is Denbighshire County Council serving people well?

- 17 Through the Auditor General's annual Improvement Assessment we will build a picture of how well the Council is serving local people. Each year we will examine the Council's services and their progress against some of their improvement objectives in relation to three important aspects of life in Denbighshire which cover most of the services that councils provide for citizens. They are:
- helping to support people in need;
 - helping people develop; and
 - helping to create a safe, prosperous and pleasant place to live.
- 18 Because 'improving the way the Council works' is one of its five improvement objectives in Denbighshire, we have also looked at how it is doing under that theme.
- 19 We carried out an initial review of all the Council's improvement objectives and will look at them in greater detail next year. We provide our views on progress with each objective in the following section.

Is Denbighshire County Council supporting people in need?

Is the Council supporting people in need through adapting service delivery to address the impact of the changing population?

- 20 **More people are able to live independently at home as services for the rising numbers of older people and those with learning disabilities are being improved. However, it is not clear if this is sufficient to meet the needs of residents.**
- 21 The population of Denbighshire is growing and the number of people needing support from social services is also increasing. One of the Council's priorities is to address the impact of the changing population on services and communities. The Council has focused this work on improving services for the increasing numbers of older people and those with complex disabilities and learning disabilities.
- 22 The Council is making good progress in doing most of what it set out to do to support older people. It is improving its range of services including re-ablement support, extra care housing and other quality of life initiatives. The national performance indicators show that the Council's service performance has generally improved for older people. For example there are increased numbers (and a greater proportion) of older people supported to live at home and therefore fewer have to live in care homes. The rates for people in hospital whose discharge is delayed are low. The support for people through electronic assistive technology has improved. However the time taken to provide an adaptation through a Disabled Facilities Grant, whilst improved, is still over a year and is below the Welsh average.
- 23 While there has been reasonable progress with current plans, it is not clear if the Council will be able to provide these services to all residents who need them in future as the number of older people in the County increases further. This is an important consideration for the Council.
- 24 In the previous year the Council exceeded its targets for supporting people with learning disabilities in the community. It has also developed a pilot project for individual budgets and self-directed support for people with learning disabilities. It was unable to meet its targets for reducing supporting people with learning disabilities in care homes because the demand for support was higher than anticipated. The Council's plans to develop 'Intensively Supported Independent Living' arrangements have been delayed and scaled down because it has not been possible to secure a full commitment from the local health board. With the number of referrals of older people and those with learning disability continuing to increase, greater pressures are being placed on limited resources.

Is the Council supporting people in need through social care services?

- 25 The role of the Care and Social Services Inspectorate in Wales (CSSIW) is to make professional assessments and judgments about social care, early years and social services and so encourage improvement by the service providers. It works on behalf of Welsh Ministers, but there are a number of safeguards in place to ensure its independence. Under new legislation there is a new framework in place for local authority social services inspection, evaluation and review.

- 26 Directors of social services are required to produce an annual self-assessment report on how well services are being delivered. The CSSIW will then undertake a review and analysis of evidence underpinning the report, including evidence from other regulators and inspectors. This analysis will result in an individual inspection and review plan for each council. The CSSIW's analysis, and the inspection and review plan, will be set out annually in a published letter.
- 27 2009-10 is the first full year of the new framework with the purpose being to establish a baseline of current performance. The full CSSIW letter is available from their website at www.cssiw.org.uk. The key messages of the letter issued in December 2010 are summarised below.
- 28 For adults, the Council has developed a range of services to support independence and it has increased the proportion of older people it supports in the community. An increasing number of carers are receiving support. The CSSIW inspection of adult protection arrangements found appropriate and effective systems in place.
- 29 The Council needs to do more to develop services for young adults with dementia and to provide a wider range of models of community based support for people with learning disabilities, including following transition from children's services. New approaches to strengthen quality assurance measures in relation to commissioned services are being introduced. The Council will also need to improve the quality and timeliness of reviews. The council needs to be more effective in helping users to access direct payments so that they can manage their own care support where they wish to.
- 30 For children, the CSSIW inspection of safeguarding in October 2009 found that effective responses were being made to allegations and decision making was timely. Child protection reviews are held within the required timescales, but the percentage of initial child protection conferences held within timescales requires further improvement. The Council has been effective in increasing the number of in-house foster carers and it has been able to reduce the percentage of children experiencing unplanned changes of school. The Council meets the expectation that all children on the Child protection Register and all 'looked after children' will be allocated to a qualified social worker.
- 31 However, the Council needs to improve the timeliness of assessments of children and to ensure that statutory visits are carried out on time. Further assessment of the effectiveness of therapeutic and support services is an area needing further development as is the improvement of transition arrangements from children's services to adult services and on leaving care.
- 32 Overall the Council has clearly articulated priorities for social services, is developing collaborative working with other councils and partners and is using innovative communications methods to engage with the public. Commissioning strategies and a workforce development strategy are in place.

Is the Council supporting people in need in other ways?

- 33 **Council revenue and benefits services and most aspects of housing services are effectively supporting people in need. However the Council and its partners need to do more to improve housing support for people with mental health needs. Youth justice services are above average.**
- 34 The Council is supporting people who claim benefits in a satisfactory way. A Wales Audit Office review (on behalf of the Department for Work and Pensions) found that the Council's performance against national indicators was in the top quarter of Welsh councils. The Council's Revenues and Benefits teams have also been awarded the Customer Service Excellence standard, formerly known as the Charter Mark, for the third time.
- 35 Most aspects of housing services are effectively supporting people in need. The Council is one of the few councils in Wales that has maintained the quality of its housing stock. Our review in 2009 concluded that work is being effectively planned, managed and co-ordinated in a way likely to meet the Welsh Housing Quality Standard for most Council managed homes by the end of 2012. Some progress has been made in reducing a backlog of repairs to the homes and the time taken to let empty properties is better than average.
- 36 Homelessness is being prevented for a high percentage of those who seek help. The delivery of homelessness services in Denbighshire is continuing to be effectively planned, managed and co-ordinated but the potential for budget reductions from 2011 presents challenges. The use of bed and breakfast accommodation for homeless people is unsatisfactory and expensive so it is good that during 2009-10, the Council only used bed and breakfast accommodation in emergencies and not at all for families with children. The overall levels of usage of bed and breakfast accommodation was less in Denbighshire than in most councils.
- 37 However, a Wales Audit Office national study, *Housing services for adults with mental health needs*, November 2010, identified concerns across North Wales in response to the housing needs of adults with mental health problems. The report found that organisations, particularly health and social care organisations, need to work together better to help people to access services. It also found that eight local authorities, including Denbighshire, operated schemes that could, in certain circumstances, exclude some vulnerable people with mental health needs from being able to get permanent housing. Such practice is contrary to guidance from the Assembly Government. The Council is preparing an amended policy.
- 38 The quality of the youth offending service covering Denbighshire and Conwy is above average in Wales. A recent Criminal Justice Joint Inspection found that in two thirds of cases, the service was effective in minimising the risk of a child or young person coming to harm and the risk of harm to other members of the public. The service's work to cut reoffending rates was done well in almost three quarters of cases. The inspection also found that in most cases, the service followed its procedures appropriately. Finally, the inspection said there was a need to improve the quality, accuracy and management oversight regarding assessments of vulnerable people.

Is Denbighshire County Council helping people to develop?

Background information

- 39 In Denbighshire, there are 53 primary schools, eight secondary schools, two special schools and special units in five primary schools. Together, these schools serve a population of just under 16,000 pupils.
- 40 The proportion of pupils of statutory school age entitled to free schools meals in Denbighshire has risen in the last four years but remains below the average for Wales.
- 41 Primary schools vary greatly in size. Just over a quarter of them, mostly situated in the coastal areas of Rhyl and Prestatyn, have over 200 pupils. Sixty per cent of all primary school pupils attend these larger schools. In contrast, almost half of the primary schools have fewer than 100 pupils, including 13 that have fewer than 50 pupils.
- 42 The numbers in secondary schools range from 354 pupils to 1,788. Two of the eight secondary schools have fewer than 500 pupils. There are 275 pupils in the two special schools.
- 43 The percentage of working age adults with no qualifications is just below the Wales average and has gradually fallen in Denbighshire since 2001. It was 14.3 per cent in 2008, which is just below the Wales average of 14.6 per cent.

Is the Council modernising the education service to achieve a high level of performance across the county?

- 44 **The Council is providing an improved education service and helping schools and children to achieve better results. However, it is not yet supporting schools to achieve the expected level of performance for many children.**
- 45 Estyn, the inspectorate of education and training in Wales, looks at how well councils are helping children and young people develop knowledge and skills. They carry out inspections of schools, further education colleges and training organisations as well as making judgements on how well councils support these education providers. Estyn, through its regional teams, analyses performance information, visits schools and has regular meetings with directors of education to come to a view about the role of the Council and about education performance in the area.
- 46 The Council made 'modernising education' a corporate priority after a critical inspection in 2007 by Estyn. The inspection led to the Assembly Government Minister for Children, Education and Lifelong Learning establishing the Denbighshire Independent Education Recovery Board to support and monitor progress.
- 47 A re-inspection by Estyn in March 2009 found that the progress and pace of improvement had been good, but challenges remained. Following further positive feedback from Estyn in early 2010, the Independent Education Recovery Board stood down. Its final report noted: 'The early stages of

- the modernising education programme have been managed effectively. The agreed policy framework should provide a firm basis for reforming educational provision in the county over the longer term. However, translating these policies into concrete proposals will pose considerable challenge and will depend on the availability of finance as well as strong leadership and management skills’.
- 48 The amount of the Council’s budget given to education is consistent with the priority it gives to modernising education. In terms of net education budget per pupil, the Council has increased its spending year-on-year from a position of third lowest in Wales in 2004-05 to eighth highest in 2010-11.
- 49 The proportion of pupils achieving the expected level in a range of subjects is called the ‘core subject indicator’³. Children are assessed at ages 7, 11, 14 and 16. In Denbighshire, the proportion of children achieving this level has risen at all ages since 2007. However, performance remains close to or below the averages for Wales. The attainment of pupils in Denbighshire at 16 is below the expected levels for similar groups of pupils. The Council has more to do to effectively support improvement at schools where performance is below expected levels.
- 50 In July 2010, the Council agreed to continue working with other councils to develop a North Wales Regional School Improvement Service. This collaboration is intended to help the councils to provide a better and more consistent range of support and challenge to schools whilst reducing management and administrative costs. The target timetable is to fully implement the regional service from September 2012.
- 51 Apart from the developments to raise attainment the Council has also made progress in modernising schools, promoting inclusion and improving its support services to schools:
- Following the adoption of the ‘Modernising Education’ policy framework in January 2009, three area reviews have started, two in the Dee Valley and one in Prestatyn. However, it is not clear how this progress compares with what is intended or needed.
 - During 2009-10 the Council prepared a draft Welsh Education Scheme which has been approved for consultation.
 - The Council has sought to improve support services to schools. ICT support has been outsourced, there has been a review of the services for schools to support staffing matters, finance, and building maintenance. There have also been annual questionnaires for schools which have helped shape the services offered. The overall impact of these developments has not yet been assessed.

³ These subjects are English or Welsh first language, maths and science in combination. The indicator covers children aged 7, 11 and 14.

Is Denbighshire County Council helping to create a safe, prosperous and pleasant place to live?

Background information

- 52 In July 2010, 3.4 per cent of 2000 residents of the working age population were out of work and claiming the Jobseekers Allowance and National Insurance credits. This is a little below the Welsh average of 3.6 per cent. In 2009, average weekly earnings in Denbighshire stood at £532, which was the fifth highest amongst the 22 Welsh local authorities. Between 1999 and 2009 earnings in Denbighshire moved from below the Welsh average to above.
- 53 In 2008-09, the proportion of 'A' roads in Denbighshire that were in poor condition was broadly similar to the proportion for Wales as a whole and to the position in the previous year. The rate (per head of population) at which people were killed or seriously injured on roads was slightly above the Wales average.
- 54 Denbighshire has a crime rate close to the average for Wales. It has fallen over the past seven years, but the figure for this year is higher than for last year. The highest proportion of these crimes is accounted for by violence against the person (26 per cent) and criminal damage (23 per cent).

Is the Council helping to reduce deprivation and regenerating Denbighshire's economy sustainably?

- 55 **The Council is making some progress in its challenging programme for regeneration and reducing deprivation, but this is a long-term plan which is likely to be made more difficult because of the financial situation.**
- 56 An earlier Wales Audit Office report entitled Regeneration in Denbighshire, issued in May 2008, concluded that 'the Council has a robust strategic framework for regeneration, a record of solid progress in regenerating areas of Rhyl with 8 of the 10 key investments having made good progress in delivering Objective 1⁴ projects'. Other reports have highlighted the fact that around 100 regeneration projects have been completed or are in progress within the county⁵. The Council appears to be continuing to make progress in many areas of its regeneration work although some work is in its early stages and the Council may need to improve the way it assesses the impact of some of the work.
- 57 The Council identified regeneration as a key priority because in some areas of the county, there are significant problems with deprivation and economic sustainability. The Council has set up a regeneration project board to oversee work set out in the Corporate Plan. This work is grouped under three themes:
- targeting deprivation in the Northern Coastal Strip and reducing the decline in the rural economy;
 - reduction in deprivation; and
 - growing Denbighshire's economy sustainably.

⁴ Objective 1 was a grants programme aimed at reducing differences in social and economic conditions within the European Union.

⁵ These reports include the Regeneration and Tourism Service Review, July 2010, and Review of Progress with the Strategic Regeneration Area and Future Programme Report to Cabinet, June 2010.

- 58 In addition to the Corporate Plan, there are a range of strategies in place to support the Council's regeneration work, including the Rhyl Going Forward Strategy and Rural Denbighshire – the Local Development Strategy 2007-13. The Council is also involved in the delivery of the North Wales Coastal Strategic Regeneration Area Action Plan which was agreed in 2009-10. Grants of £4.2 million were claimed for Council projects in the year. Work is taking place to improve the housing property market in Rhyl, to provide anti-poverty and welfare rights advice, to engage with communities, support the development of skills and to help develop and support social enterprises.
- 62 Until now, the Council has not kept a track of how far its work has reduced the risk of flooding for residents. However, it is now adding a new measure of performance to monitor the number of properties with a reduced risk of flooding as a result of programmed work. This new measure may be a useful guide to the benefit of work undertaken although it does not indicate how many other properties remain at risk of flooding.
- 63 Further progress on improving road quality and flood defences is heavily dependent on extra funding being available. The Council would need to consider carefully how to use this funding and would need to be clearer about exactly what it hopes to achieve, who will benefit and how improvements will be sustained.

Are the road network and flood defences improving?

- 59 **The proportion of roads in Denbighshire that are in a poor condition increased last year and despite progress on some flood defence schemes the Council isn't able to assess the effectiveness of its work to reduce flooding.**
- 60 The condition of roads in Denbighshire is not improving. The Council reports that progress on improving roads in 2009-10 has been disappointing, partly due to the severity of the winter. The condition of principal roads worsened in a similar way to the Wales average but non-principal roads worsened by more than average.
- 61 There has been progress in implementing some flood relief schemes. Work on the Denbigh Flood Scheme is due to be completed this year and the West Rhyl Flood Scheme is expected to start. But we are not able to assess if this progress is as great as the Council intended and whether the work to reduce the backlog on gully emptying has been undertaken.

Is other activity helping to create a safe, prosperous, and pleasant place to live?

- 64 **The Council has made excellent progress on waste management and recycling. It is implementing plans for improving leisure services but does not have an overall strategy in place to guide its work on these services.**
- 65 The Council has made excellent progress on waste management and recycling through the introduction of mixed collections of recyclable waste. The Council has worked effectively with residents over the changes in collection arrangements and this example of good customer engagement is one that could be used as an example for other service areas. In 2009-10 Denbighshire had the highest rate of recycled waste across the 22 local authorities in Wales.

66 The Council is part of the five-council North Wales Waste Treatment Partnership, which has developed a plan for a shared waste treatment facility. The Assembly Government has recently awarded a grant of £142 million towards the new treatment facility.

67 We undertook a review of the Council's leisure provision in 2009, and concluded that the Council does not have sufficient arrangements in place to fully support coherent and effective leisure provision. However, our report said that the Council has developed proposals which, if implemented, will address current shortcomings and improve services for the community. Several recommendations were made in our report; the first of which was to develop a coherent strategy supported by a clear, closely monitored, and resourced action plan. The Council has made progress on many of the recommendations but has not yet developed and agreed its strategy. It is intending to do so in 2010-11.

Is the Council achieving its objective of 'improving the way it works'?

68 **The Council is making progress in improving the way it works including partnership working and in developing strong leadership and governance. Further work is planned in many areas including improving value for money and better understanding the needs of local communities.**

69 The objective of 'improving the way the Council works' brings together the four improvement themes in the Council's Corporate Plan, and contributes to Denbighshire's aim of becoming a high performing council. The four themes are for the Council to:

- have a high performance culture – delivering value for money;

- be community and people focused;
- be outward looking; and
- have strong governance and leadership for improvement.

High performing and value for money

70 The Council has defined what it means by 'high performing' as improving performance in relation to a number of key measures known as National Strategic Indicators (NSIs). The target given in the Corporate Plan 2009-12 is being in the top half of councils in Wales in relation to the NSIs. The Council has identified a group of 23 indicators which it would judge itself on. These are based on 19 of the 26 NSIs for 2010-11.

71 In 2009-10 the Council was in the top half for 16 of these indicators, compared with 13 the previous year. Performance improved in 13, remained the same in four and deteriorated in five. When compared with other Welsh councils against a larger set of measures, Denbighshire had the highest number of performances in the top quarter and the lowest in the bottom quarter. Not all the performance indicators measure the quality of services or outcomes for service users and residents but, when set alongside improved reports by regulators and a range of other developments, they do illustrate good progress by the Council.

72 However, the Council's definition of 'high performing' may be misleading where it is used to describe a whole service based on only one or two performance indicators. For example, there is only one indicator that refers to housing and homelessness services. These services therefore cannot be classed as 'high performing' based on only one indicator.

73 Several developments are underway to help improve efficiency and deliver better value for money. These include using technology to reduce paperwork, streamlining services, and reviewing how buildings and land are used. The way in which the Council links its priorities to how it uses its money (known as Medium Term Financial Planning) has not been well developed and it is working to improve this. The Council also needs to improve the use of unit costs and to benchmark its costs against other councils.

Community and people focused

74 Listening to and understanding community needs should help the Council to design and deliver appropriate services. A Statement of Intent from the Council in 2008 included a strategic aim of 'Bringing the Council Closer to the Community'. The Statement of Intent implied that being close to the community would be a 'golden thread' running through the way the Council does business. However, despite a number of developments, we haven't found that to be the case in practice.

75 One of the ways in which the Council is measuring whether it is being more community focused is by asking people if they feel the Council acts on their concerns and treats them fairly. In 2009, only 46 per cent of residents who responded to a survey agreed that the Council acts on the concerns of residents and 64 per cent believed the Council treats all people fairly. However, we consider that improvement in these figures on their own, does not necessarily mean the Council is 'closer to the community'. A variety of factors can affect how people respond and not everyone fills in such surveys (for example, residents under 16 were excluded from the survey). As surveys are only conducted every two years, it will be difficult to

interpret the progress in between. The Council has also not published any information about how the results of the survey will influence its work, which is a missed opportunity to show how it is listening to the residents' views.

76 Another element of being community focused has been to develop Denbighshire as a bilingual county. The Council's Welsh Language Scheme was revised in 2009 and received approval from the Welsh Language Board⁶ (WLB). The WLB has praised the Council's Leisure Service for its partnership in financing a new Youth Worker post with the Urdd (the organisation that aims to give children and young people the chance to learn and socialise through the medium of Welsh). The Council was also praised for its promotional work that led to a rise in the number of calls received directly to the Welsh language line. The WLB has found that the Council's website, electoral documentation and statutory and recruitment adverts comply with the Welsh Language Scheme.

77 Other actions intended to bring the Council closer to the community include the Council Leader chairing a range of community forums with the Local Service Board (LSB) partners. Local area committees are also being developed but it is not clear what they are intended to achieve. We will look at the progress of this work in our next report in 2011. The Council has not clearly set out who amongst its senior officers is responsible for leading work to achieve the target of becoming 'closer to the community.'

⁶ The Welsh Language Board works with local authorities to help them develop their statutory Welsh language schemes that outline the way in which they provide services to the public in Welsh.

Outward looking, and having strong governance and leadership

- 78 The Council's theme of being 'outward looking' is about developing its partnerships and collaboration with other councils and partner agencies. We looked at the approach to partnership working in the Preliminary Corporate Assessment. We found that the Council was already working well in partnerships with others and was planning further collaboration. This is a significant area for the future as all public bodies seek to find more efficient ways to deliver services together. The Council is making good progress towards their aim of putting a major joint waste management project in place with other councils. It is also working towards improving workforce skills, joining up health and social care programmes, and reducing deprivation in Rhyl through local delivery agreements with other local partners.
- 79 We also found good leadership in place that was leading change. The Council is aiming to review its democratic and management structures to provide further improvements to leadership by officers and councillors. It has already started to work on these developments and is making good progress.

What should the Council do?

- 80 Given the wide range of services provided and the challenges facing the Council it would be unusual if we did not find things that can be improved. The Auditor General is able to:
- recommend to Ministers of the Assembly Government that they intervene in some way;
 - conduct a special inspection and publish the report with detailed recommendations;
 - make formal recommendations for improvement – if a formal recommendation is made the Council must respond to that recommendation publicly within 30 days; and
 - make proposals for improvement – if we make proposals to the Council, we would expect them to do something about them and we will follow up what happens.
- 81 In the light of our work, the Auditor General is not making any formal recommendations but the Council should consider our following proposals to help it improve:

Proposals we made in our earlier work (the Corporate Assessment)

- the Council should further develop and implement its plans to streamline decision making and scrutiny to ensure that roles are clear and time is given to the matters that are considered the most important;
- the success criteria for achieving the ambition to be a high performing Council closer to the community should be more clearly expressed so that levels of progress can be assessed; and
- the Council leadership should improve the way in which it assesses its value for money and how this is communicated, so that elected members and officers have an improved understanding of the progress made in improving efficiency.

Additional proposals

- the Council should include children and young people in its consultations and engagement where appropriate;
- the accountability and monitoring for becoming 'closer to the community' should be clearer;
- the Council should monitor progress on whether it is doing sufficient to address the impact of demographic change and to achieve a more balanced population; and
- the Council should set clearer outcome measures for improving roads and flood defences that show how residents will benefit from the Council's work.

Appendix 1

About the Auditor General for Wales and this report

The Auditor General

The Auditor General is independent of government and is appointed by Her Majesty the Queen. He leads the Wales Audit Office and is held accountable by the Public Accounts Committee of the National Assembly for the Wales Audit Office's work.

The Wales Audit Office helps the Auditor General by examining various aspects of how Welsh public bodies work. It was created in 2005 when the National Audit Office in Wales and the Audit Commission in Wales merged.

The Auditor General is the external auditor of the Assembly Government and its sponsored and related public bodies; the National Assembly for Wales Commission and National Health Service (NHS) bodies in Wales. He also appoints the external auditors of Welsh local government bodies, including unitary authorities, police, probation, fire and rescue authorities, national parks and community councils.

As well as carrying out financial audit, the Auditor General's role is to examine how public bodies manage and spend public money, including achieving value in the delivery of public services. The law which created the Wales Audit Office also expanded the powers of the Auditor General to follow the 'public pound' wherever it goes.

This report

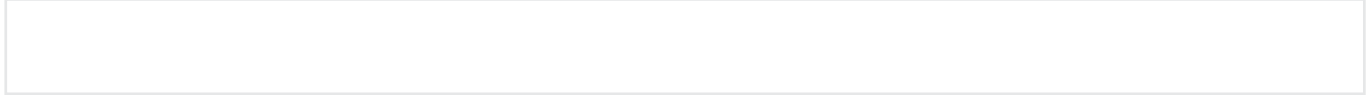
The Local Government (Wales) Measure (2009) (the Measure) introduced new responsibilities for the Auditor General, including a responsibility to publish his assessment of each council's/authority's arrangements to secure continuous improvement.

Improvement authorities also have new responsibilities under the Measure, which includes a general duty to 'make arrangements to secure continuous improvement in the exercise of [their] functions'. Improvement authorities are defined as local authorities, national parks, and fire and rescue authorities.

This report has been produced by the Auditor General for Wales to discharge his duties under section 24 of the Measure. The report also discharges duties under section 19, namely; to issue a report certifying that he has carried out an audit under section 17 and an improvement assessment under section 18.

The main piece of work for the Wales Audit Office, to enable the Auditor General to fulfil his duties, is an annual Improvement Assessment⁷.

⁷ This assessment will be conducted for each improvement authority, under section 18 of the Measure. For each authority, it will determine whether the authority is likely to comply with the requirements of Part 1 of the Measure. The Wales Audit Office will also undertake an improvement information and planning audit, as required under section 17 of the Measure, in order to ascertain whether the authority has discharged its duties under section 15(1) to (7).



This annual Improvement Assessment will be informed by a:

- Corporate Assessment – a forward-looking assessment of an authority’s likelihood to comply with its duty to make arrangements to secure continuous improvement; and
- Performance Assessment – a retrospective assessment of whether an authority has achieved its planned improvements in order to inform a view as to the authority’s track record of improvement.

The output(s) from these assessments will be issued by the Auditor General as Audit and Assessment Report(s), under section 19 of the Measure. In publishing this report under section 19, the Auditor General for Wales is certifying that we have undertaken a section 17 audit and a section 18 improvement assessment.

The Auditor General may also in some circumstances carry out Special Inspections (under section 21), in respect of which he will provide a report to the relevant authorities and Ministers, and which he may publish (under section 22).

The Auditor General will summarise Audit and Assessment Reports in this published Annual Improvement Report (under section 24). This will also summarise any reports of Special Inspections.

An important ancillary activity for the Wales Audit Office is the co-ordination of assessment and regulatory work (required by section 23), which takes into consideration the overall programme of work of all relevant regulators at an improvement authority. The Auditor General will also take account of information shared by relevant regulators (under section 33) in his assessments and this report will summarise any work undertaken by them.

The Auditor General sets out the fee for his performance audit work undertaken to discharge his duties under the Measure at each local authority in a Regulatory Programme agreed each year with the authority. The fee for November 2009 until March 2011 is currently expected to be in line with that set out in the Regulatory Programme.

Appendix 2

Useful information about Denbighshire and Denbighshire County Council

In 2008-09 the Council spent £218 million of revenue, equating to £2,235 per resident and in the same year the Council also spent £47 million on capital items. The average band D council tax in 2009-10 for Denbighshire was £1,201 per year; this will increase by 2.63 per cent to £1,232 for 2010-11 and 75 per cent of Denbighshire's housing is in council tax bands A to D.

There are 47 councillors for Denbighshire who represent the community and make decisions about priorities and use of resources. The Leader is Councillor Hugh H Evans. The Council is made up of councillors from the following political groups:

- 18 Conservatives
- 10 Independent
- 8 Plaid Cymru
- 5 Labour
- 3 Independent First
- 1 Welsh Liberal Democrats (Independent)
- 2 not affiliated

Denbighshire's Chief Executive is Dr Mohammed Mehmet and his management team includes:

- Corporate Director Lifelong Learning: Hywyn Williams
- Corporate Director of Social Services & Housing: Sally Ellis
- Corporate Director Environment: Iwan Prys Jones
- Corporate Director Efficiency & Governance: Bethan Jones

For more information see the Council's own website at www.denbighshire.gov.uk or contact the Council at Denbighshire County Council, County Hall, Wynnstay Road, Ruthin LL15 1YN.

The Assembly Members for Denbighshire are:

- Ann Jones, Vale of Clwyd, Labour
- Darren Millar, Clwyd West, Conservative
- Karen Sinclair, Clwyd South, Labour

The Members of Parliament for Denbighshire are:

- Chris Ruane, Vale of Clwyd, Labour
- David Jones, Clwyd West, Conservative
- Susan Elan Jones, Clwyd South, Labour

Appendix 3

The Auditor General's Corporate Assessment

The main conclusions of the Auditor General's Corporate Assessment which was issued to the Council in July 2010 are set out below.

Overall conclusion

Good leadership is driving change, making Denbighshire County Council well placed to deliver better outcomes despite current weaknesses in some arrangements.

How the Council has approached improvement over time

The Council has recovered from a turbulent period and has clearer objectives and improving arrangements that can lead to improved outcomes:

- before 2008, the Council experienced a turbulent period in which there was ineffective leadership and some services were unsatisfactory;
- since then, more stable political leadership and new management arrangements have set clearer objectives and are creating a culture of ambition and openness to change; and
- the Council recognises that it faces major challenges but the improving arrangements give grounds for optimism that it can turn its plans into positive outcomes.

Analysis of the Council's arrangements to help it improve

Good leadership is leading change with governance, policy and strategy, partnership working and business processes positively supporting improvement whilst fully effective arrangements for the best use of staff and resources are not yet in place:

- The Council's arrangements show particular strengths in relation to leadership. Governance arrangements are now reasonably effective although further progress is planned.
- The Council is already working through partnerships to achieve improvement and is planning to develop this further.
- The policy and strategy framework will positively support improvement.
- Business processes generally support improvement but the effectiveness of recent changes is not yet clear.
- There are weaknesses in relation to current arrangements for making the best use of staff, although these are recognised and action is being planned.
- Financial management is generally sound but medium-term financial planning is under-developed and the task of modernising the Council's asset base is at an early stage.

For the full report see our website at www.wao.gov.uk.

Appendix 4

Appointed Auditor's Annual Letter to the Members of Denbighshire County Council

Denbighshire County Council complied with financial and performance improvement reporting requirements

It is the Council's responsibility to:

- put systems of internal control in place to ensure the regularity and lawfulness of transactions and to ensure that its assets are secure;
- maintain proper accounting records;
- prepare a Statement of Accounts in accordance with relevant requirements;
- establish and keep under review appropriate arrangements to secure economy, efficiency and effectiveness in its use of resources; and
- publish its Improvement Plan by 31 October.

The Code of Audit Practice (the Code) issued by the Auditor General requires me to:

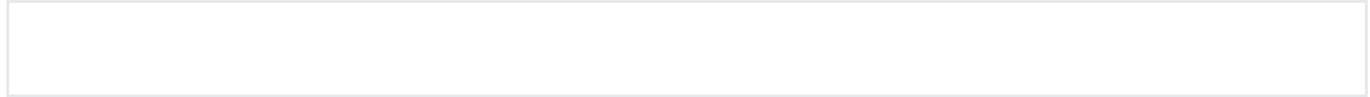
- provide an audit opinion on the accounting statements;
- review the Council's arrangements to secure economy, efficiency and effectiveness in its use of resources;
- consider whether the Improvement Plan is prepared and published in accordance with statutory requirements; and
- issue a certificate confirming that I have completed the audit of the accounts.

On 30 September 2010 I issued an unqualified audit opinion on the accounting statements, confirming that they present a true and fair view of the Council's financial transactions.

My key findings were that:

- no material weaknesses in the accounting and internal control systems were identified;
- a £21 million material error relating to the overstatement of asset values was corrected;
- no significant concerns arose in respect of the qualitative aspects of your accounting practices and financial reporting; and
- the Whole of Government Account's return was prepared effectively and in accordance with the Assembly's timetable.

I reported the key matters arising from my audit of the statement of accounts to the Corporate Governance Committee on 27 September 2010.



My review of the Council's arrangements to secure economy, efficiency and effectiveness has been based on the audit work undertaken on the accounts as well as placing reliance on the work completed as part of the Measure. The main findings from this work will be set out in the Annual Improvement Report.

The Council's Improvement Plan 2010-11 meets statutory requirements and includes a report of its performance in 2009-10. Suggestions for further improvements will be set out in the Annual Improvement Report.

I carried out the audit of the statement of accounts of the Council in accordance with the requirements of the Public Audit (Wales) Act 2004 and the Code issued by the Auditor General. However, I cannot formally conclude the audit and issue the certificate until I have been able to fully consider matters brought to my attention by members of the public.

The financial audit fee for 2009-10 is currently expected to be in line with that set out in the Financial Audit Strategy.

Ann-Marie Harkin
For and on behalf of the Appointed Auditor
30 November 2010

Appendix 5

Denbighshire County Council's improvement objectives and plans

Council objectives

The Council has published its Improvement Objectives Plan which can be found on the Council's website at www.denbighshire.gov.uk. They are:

- adapting service delivery to address demographic changes;
- reducing deprivation and growing Denbighshire's economy sustainably by strategically targeting resources;
- modernising the education service to achieve a high level of performance across the county;
- securing a sustainable road network and flood defences; and
- improving the way the Council works.

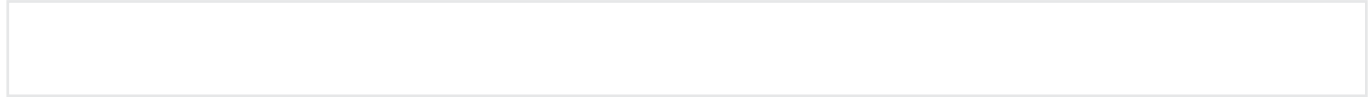
How the objectives and plans have been developed

Under the Measure local authorities are required to agree and publish improvement objectives. The improvement objectives for the year should be published as soon as practical after the beginning of April each year. In Denbighshire the priorities and themes were developed and included in the three-year Corporate Plan 2009-12 and published in 2009 but the Council did not formally refer to these as its improvement objectives. It has since decided to combine the four 'Improvement themes' under the title 'Improving the Way the Council works' and that this and the four corporate priorities constitute its five improvement objectives. This was published on its website on 1 October 2010. It has also published a plan covering the second year of the period. This is entitled *Delivering the Corporate Plan 2010-11*.

Whilst the Council circulated its Corporate Plan 2009-12 to community councils and partners and had previously consulted other members of the Local Service Board⁸ on its priorities, it has done little to inform residents about its priorities. For example, it has not used the County Voice newsletter that is circulated to all 44,000 homes in the county. It has since held road shows for staff and has been involved in community forums to discuss local needs and future priorities. The Council should continue to develop work to get the views of local people on its improvement objectives and in future years to publish them sooner and more effectively.

To ensure that the Council's improvement plans are sufficiently focussed, we examined whether the Council is clear about how people will be better off if it improves in the ways that it intends to. The improvement objectives are reasonably clear so it should be possible for the Council to measure whether it is achieving the objectives. However, for some of the objectives it will be more difficult to measure whether people are actually benefitting. The Council has recognised this and is proposing some changes to how they will evaluate progress. For example, it is proposing to add a new measure to its objective about improving flood defences to assess the number of properties with reduced risk of flooding as a result of planned work. However, unless it also shows the proportion of properties that are at risk, this will not show the extent to which there is a reduction in overall risk of flooding. The Council needs to do more work to improve these measures.

⁸ Local Service Boards are the public and voluntary sector leaders within each county who work collectively to improve the county and its services for the benefit of its residents, visitors and businesses.



The *Delivering the Corporate Plan 2010-11* document is generally well written and clear about the objectives the Council has set and the actions it intends to take. In line with the Council's intention to become 'closer to the community' the plan summarises the actions being taken under each of the four corporate priorities in each of the six Community Areas of the County. The plan includes a summary of financial information which includes a short list of areas for savings but does not show how the Council is changing the allocation of its funds to help it carry out the work to achieve its priorities.

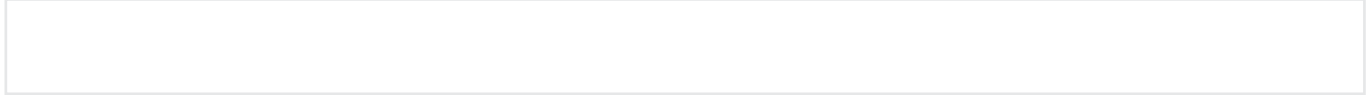
The inquiry report following the death of Victoria Climbié in England, included a recommendation that 'chief executives and lead members of local authorities with social services responsibilities must ensure that children's services are explicitly included in their authority's list of priorities and operational plans'⁹. But *Delivering the Corporate Plan 2010-11* does not include or refer to safeguarding children or social services for children. The *CSSIW Annual Performance Assessment Report for 2009-10* noted that 'corporate support and lead member involvement was seen to be positive in the area of children and adult safeguarding'. Nevertheless, the Council will want to ensure that by focusing on the corporate priorities it does not lose sight of its safeguarding children responsibilities.

We also assessed the Council's arrangements for planning and resourcing improvements. We found that the Council is not always good at ensuring that the plans and priorities of different services are linked together coherently. However, the Council is addressing this through a new business planning system and new guidance about how to ensure different plans and policies link together. We will assess whether the new arrangements are effective in our next report. The Corporate Plan 2009-12 included initial information about how the priorities would be funded but the more recent documents provide less information. The Council will review its plans to reflect the more difficult financial times as part of its efficiencies programme and following consultation with partners and the public.

Every Council needs to have good information and use it well if it is to provide good services and to improve them further. We found the authority has put in place adequate systems to produce a set of key performance measures known as the National Strategic Indicators (NSIs) (although there is one indicator where the Council was not able to follow the guidance).

Overall, the Council's Corporate Plan 2009-12, the *Delivering the Corporate Plan 2010-11* document, the paper *Performance Framework for Denbighshire County Council's Improvement Objectives 2010-11* and the *Annual Performance Improvement Plan* meet the statutory requirements for improvement plans and objectives. However, to fully meet the published guidance the Council should be clearer about the consultation arrangements and why particular priorities were chosen. It should also address gaps identified against the specific objectives where the outcomes are not clear, robust and measurable.

⁹ The Victoria Climbié Inquiry report by Lord Laming, p394, January 2003



Specific objectives

Demographic change

The Corporate Plan 2009-12 says that Denbighshire has a high and increasing proportion of older people and has a limited range of services available for these people. Denbighshire also has a population growing by about one thousand people (one per cent) every year. The Council decided that addressing this demographic change by achieving a more balanced population should be one of its top priorities. The plan aims to keep and attract young people through high quality schools, training opportunities, jobs and housing, and business opportunities. The Council has initially focused its 'demographic change' priority on addressing the impact of people living longer and the increasing numbers with complex disabilities and learning disabilities. Work under other areas, including education and regeneration and by partner organisations, may contribute to the wider agenda to achieve a more balanced population but the impact of this is not being pulled together or co-ordinated in a clear way.

The Corporate Plan and subsequent plans clearly state that the Council aims to increase independence and choice for older people and those with learning disabilities and to increase community wellbeing. Actions and measures are set out around these areas but in themselves these will not demonstrate whether people actually have better choice, quality of independence or whether costs for those with learning disabilities have been contained.

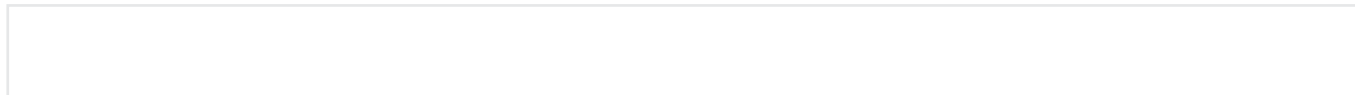
Modernising Education

The 'Modernising Education' objective has three streams of work: improving standards in schools while promoting inclusion; modernising schools; and monitoring and evaluating support services to schools. A Modernising Education Project Board, which oversees the work, involves councillors, senior officers, and headteacher representatives.

The Council's measures of success focus on the first workstream of improving standards in schools and are all about pupils' attainment. Despite many developments, performance reports are less clear whether progress is being achieved on the other workstreams of modernising schools or improving support services. For 2010-11, the Council intends to use additional satisfaction measures to gauge progress. They will do this by using information from the 2009 residents' survey. These new measures are about satisfaction with primary and secondary education and progress since the Estyn report of 2007. They results will tell the Council the views of people aged over 16 who took part in the survey. But this information will not tell the Council the views of everyone and it excludes the views of people under the age of 16 years. The levels of satisfaction may be lower than expected at the moment because of school modernisation plans involving the closure and amalgamation of schools.

The other element of the first workstream is 'promoting inclusion'. During 2009-10 the Council prepared a draft Welsh Education Scheme which has been approved for consultation. It is not clear what the other objectives are for promoting inclusion.

The Council has made progress with the second workstream of school re-organisation and modernisation. However, it is not clear how this progress compares with what is intended or needed. Similarly, there have been a range of developments in relation to the third workstream about support services but it is not clear how progress is being monitored.



Regeneration

The Council has identified regeneration as a key priority with three themes:

- targeting deprivation in the Northern Coastal Strip and reducing the decline in the rural economy;
- reduction in deprivation; and
- growing Denbighshire's economy sustainably.

In addition to the Corporate Plan, there are a range of strategies in place to support the Council's regeneration work, including the Rhyl Going Forward Strategy and Rural Denbighshire – the Local Development Strategy 2007-13.

However there are some weaknesses in the way the Council is evaluating the progress of its regeneration work, including:

- Progress in relation to the three themes in the Corporate Plan is being measured on the basis of limited information. The Council needs to consider more population-level measures and targets including those concerned with deprivation areas and housing, in order to judge the impact of its work.
- For some of the measures of regeneration in the Corporate Plan, the Council has not defined a starting point from which improvement can be judged.
- Some of the information used in performance reports is inaccurate and presents a confusing picture of progress and improvement.

Improving roads and flood defences

The Council's fourth corporate priority, securing a sustainable road network and flood defences, is appropriate in that it stems from deterioration in the condition of highways and some major flooding incidents. Having said that, we think the Council's rationale for selecting this as a priority is not clearly laid out. The *Improvement Plan 2009-12* notes that the condition of roads had been the subject of a high level of complaints and that councillors received considerable feedback about the issue. However, the draft *2009-10 Annual Performance Review* says that 'general satisfaction with the road network is relatively high'. These mixed messages are confusing, and make it difficult for the residents to understand the issues.

The intended outcome is to achieve 'an overall improvement in the condition of our infrastructure, reduced maintenance backlogs, fewer complaints'. The focus narrows to operational matters and the measures of progress are for schemes started plus treatments and the proportion of roads in poor condition. However there are no targets or measures of the overall reduction of flooding risk, backlog levels or even complaints. From 2010-11, satisfaction measures have been included with baseline levels from the 2009 residents' survey. There are no baselines or measures for flood defences work. There is no explicit link to who should benefit from the roads work – businesses or specific communities? The rate (per head of population) at which people were killed or seriously injured on roads has been slightly above the Wales average but it is not clear if the Council is seeking to reduce accidents and there is no reference to accidents, insurance claims, complaints or problems for particular towns or villages. It is therefore unclear what specifically the Council is planning to achieve.

Appendix 6

References

All the data referred to within the report is drawn from one of the following sources:

- Welsh Assembly Government, StatsWales
- Welsh Assembly Government, local area summary statistics
- Improvement Authority's own websites and Improvement Plans
- The Wales Yearbook
- The Home Office
- Members' Research Service
- Office for National Statistics