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Auditor General for Wales

Well-being of Future Generations: An examination of Delivering Care Services with Five Area Teams – **Gwynedd Council**

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The team who delivered the work comprised Alan Hughes, Euros Lake and Jeremy Evans under the direction of Huw Rees.

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Summary report

Summary

Why we undertook the Examination

- 1 In accordance with the Well-being of Future Generations (Wales) Act 2015 (the Act) the Auditor General for Wales (the Auditor General) is statutorily required to examine public bodies to assess the extent to which they have acted in accordance with the sustainable development principle when:
 - a. setting their well-being objectives; and
 - b. taking steps to meet them.
- 2 The Act defines the sustainable development principle as acting in a manner: '...which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs'.
- 3 The Auditor General must provide a report on his examinations to the National Assembly for Wales at least a year before each Assembly election. The first such report must be published by 2020, before the 2021 Assembly election.
- 4 The Auditor General has undertaken examinations across the 44 bodies covered by the Act to inform his report to the National Assembly during 2018-19 and 2019-20.
- 5 The findings in this report are based on fieldwork that we undertook during the period August 2019 to October 2019.
- 6 This report sets out our findings from our examination of Delivering Care Services with Five Area Teams, a step Gwynedd Council (the Council) is taking to meet its Well-being Objectives.
- 7 It also sets out the Council's initial response to our findings.

What we examined

- 8 We examined the extent to which the Council is acting in accordance with the sustainable development principle in Delivering Care Services with Five Area Teams.

- 9 In order to act in accordance with the sustainable development principle public bodies must take account of the following ‘ways of working’:

Exhibit 1: the ‘five ways of working’

The table below sets out the ‘five ways of working’ as defined in the Welsh Government’s **Well-being of Future Generations (Wales) Act 2015 The Essentials**¹ document.

The Five Ways of Working
Long term The importance of balancing short-term needs with the need to safeguard the ability to also meet long-term needs.
Prevention How acting to prevent problems occurring or getting worse may help public bodies meet their objectives.
Integration Considering how the public body’s well-being objectives may impact upon each of the well-being goals, on their other objectives, or on the objectives of other public bodies.
Collaboration Acting in collaboration with any other person (or different parts of the body itself) that could help the body to meet its well-being objectives.
Involvement The importance of involving people with an interest in achieving the well-being goals, and ensuring that those people reflect the diversity of the area which the body serves.

- 10 Our examination found that: **The Five Area Teams’ aim naturally aligns with the sustainable development principle, but by embedding the five ways of working within the Council’s Ffordd Gwynedd approach, it could take fuller advantage of the opportunities offered by the Well-being of Future Generations (Wales) Act.**

¹ Welsh Government, **Well-being of Future Generations (Wales) Act 2015 The Essentials**, 2015.

Detailed report

Part One: Examination Findings

The Five Area Teams' aim naturally aligns with the sustainable development principle, but by embedding the five ways of working within the Council's Ffordd Gwynedd approach, it could take fuller advantage of the opportunities offered by the Well-being of Future Generations (Wales) Act

- 11 The Council places great emphasis on applying its 'citizen-focused' approach 'Ffordd Gwynedd'. In managing the messages relating to its way of working the Council has limited exposure of officers to the Well-being of Future Generations (Wales) Act 2015. As a result many officers could not demonstrate active consideration of the sustainable development principle or the five ways of working.
- 12 The Council could better demonstrate that 'Ffordd Gwynedd' fully incorporates the five ways of working by using key phrases within its overarching vision. This would show more clearly how these aspects are included as part of the Council's decision-making process.

The Council celebrates operational differences for the area teams but needs to assess what is working well and what is not, this together with meaningful data analysis and a sustainable financial model would allow the Council to understand and plan better for the long term

What we looked for

- 13 We looked for evidence of:
 - a thorough understanding of current and long-term needs and the associated challenges and opportunities;
 - planning over an appropriate timescale;
 - resources allocated to ensure long-term benefits; and
 - appropriate monitoring and review.
- 14 Our examination was also informed by the positive indicators for the 'long term' that we have identified and used as part of this examination.²

² See Appendix 1

What we found

15 We identified the following strengths:

- the Council understands the current pressures on the service and believes that the pressure will only increase over the medium to long term; and
- the Council's approach to put the person at the centre of everything it does, links well to its goal of achieving better outcomes for service users now and in the future.

16 We identified the following opportunities:

- the Council celebrates the functional differences seen within each area, but it is not clear if the differences are intended or not or whether the Council can be sure that citizens across the county have equitable access to services;
- without meaningful data analysis to understand demand and impact for current and future need, the Council is using pen pictures and case studies to capture individuals' stories. Using data better would improve the Council's ability to shape the service and to determine if it is being successful or not;
- a pause and review taking into account the effectiveness, economy and efficiency of current solutions within each of the area teams, assessing what works well and what not so well, would help the Council identify the next steps for each location;
- the Council needs to develop a sustainable resource model for the Area Teams (people, place, money) for the medium to long-term, reducing uncertainty.

The Council recognises the preventative benefits that a sustainable and accessible adult service provides, but needs to promote early contact and could do more to understand the root causes of the problems that the service is trying to address

What we looked for

17 We looked for evidence of:

- thorough understanding of the nature and type of problem the step could help prevent from occurring or getting worse;
- resources allocated to ensure preventative benefits will be delivered; and
- monitoring and review of how effectively the step is preventing problems from occurring or getting worse.

18 Our examination was also informed by the positive indicators for 'prevention' that we have identified and used as part of this examination.³

What we found

19 We identified the following strength:

- the Council is aware of the preventative benefits of providing opportunities for adults to improve their well-being and offer a service that increases the level of early intervention and prevention, with better access to information and community resources with a view to reducing the need for adult care services.

20 We identified the following opportunity:

- whilst the preventative agenda is an inherent part of the operation of the five area teams, the Council and its partners could:
 - do more to encourage people to present earlier and actually reap the rewards of preventative/earlier intervention; and
 - further explore the potential of data analytics to engage in actively progress the preventative agenda. For example demand/volume, types of services required and a deeper understanding of the root causes of problems the service is trying to address.

Operationally the Council and health board have demonstrated their commitment to an integrated approach, but further work is needed to move to fully joined-up service delivery and engage with a wider range of partners

What we looked for

21 We looked for evidence of consideration of:

- how this step could contribute to the seven national well-being goals;
- how delivery of this step will impact on the Council's well-being objectives and wider priorities; and
- how delivery of this step will impact on other public bodies' well-being objectives.

22 Our examination was also informed by the positive indicators for 'integration' that we have identified and used as part of this examination.⁴

³ See Appendix 1

⁴ See Appendix 1

What we found

23 We identified the following strength:

- frontline Council and Health Board teams, together with third sector representatives, are already experiencing some successes; these evidence what can be achieved through integrated working.

24 We identified the following opportunities:

- the Council officers we spoke to verbalise an awareness of the impact of their activity on the other Council well-being objectives and the national well-being goals, but this is not formally acknowledged or recorded.
- the Council is aware of the impact of their activity on the well-being objectives of BCUHB, but could do more to engage with and integrate with other stakeholders and potential partners.
- actively seeking out and developing a full range of internal and external partners and helping support the move to a truly joined-up service delivery would bring benefit.
- efforts have been made to co-locate Health and Adult Services team members which provides opportunities for practitioners to work together for the benefit of service users. Staff report the benefits of working together as a result of being co-located but a lack of strategic leadership is not helping drive change by supporting the unblocking of barriers to more integrated working. As such key cultural differences and organisational/operational boundaries remain hampering true integrated working.
- other examples of barriers to more integrated working with health partners are:
 - IT (networks, hardware and software);
 - information – single version of the truth/single record; and
 - shared resources (for example administrative support, Occupational Therapists).

The Five Area Teams demonstrate the commitment of the Council and Health Board to collaborate, but there are opportunities to establish shared solutions and ways of working

What we looked for

25 We looked for evidence that the Council:

- has considered how it could work with others to deliver the step (to meet its well-being objectives, or assist another body to meet its well-being objectives);
- is collaborating effectively to deliver the step; and

- is monitoring and reviewing whether the collaboration is helping it or its stakeholders meet well-being objectives.
- 26 Our examination was also informed by the positive indicators for 'collaboration' that we have identified and used as part of this examination.⁵

What we found

- 27 We identified the following strengths:
- the Council is collaborating with Betsi Cadwaladr University Health Board to deliver an integrated approach through the five area teams;
 - the Council is recording some individuals' stories to demonstrate that joined-up service delivery is effective;
 - currently Gwynedd Council IAA is operated by Council staff and is the access point to Council services. Plans are in place to include BCUHB in the integrated IAA; and
 - almost two-thirds of carers surveyed in Gwynedd during 2017-18 told us they found out that their needs as a carer could be assessed for assistance via a professional (rather than published information, for example). This suggests good knowledge from the Council and its partners (eg health) regarding access routes – a sign of positive working relationships.
- 28 We identified the following opportunities:
- third sector bodies expressed an appetite for greater engagement with the Council, and were eager to develop more opportunities to contribute to the well-being agenda;
 - whilst hubs are not intended to be a physical location for individuals to present, a consequence of having the hubs may be that people present at those locations, therefore the Council needs to consider how it will manage this situation as there appears to be no formalised presence at some of the hubs; and
 - staff recognise the additional value of proactive collaboration with groups such as general practitioners and the third sector, but the Council needs to do more to ensure that such benefits are delivered in all communities.

⁵ See Appendix 1

The Council has worked with stakeholders to deliver the remodelling of its adult service, but better engagement with service users would help the Council assess the effectiveness of the new arrangements

What we looked for

- 29 We looked for evidence that the Council has:
- identified who it needs to involve in designing and delivering the step;
 - effectively involved key stakeholders in designing and delivering the step;
 - used the results of involvement to shape the development and delivery of the step; and
 - sought to learn lessons and improve its approach to involvement.
- 30 Our examination was also informed by the positive indicators for 'involvement' that we have identified and used as part of this examination.⁶

What we found

- 31 We identified the following strength:
- assessing individuals using a strengths-based what matters conversation is a means of involving people in choices made about their care and well-being, on an individual level. In line with the Social Care and Well-being Act, the Council views this as a core aim of its approach.
- 32 We identified the following opportunities:
- community connectors map opportunities for individuals to undertake activity and support within the community. Whilst there are plans to publish the information in booklets, the Council needs to maximise the use of other outlets such as social media and web based content.
 - some of the representatives from the third sector suggested that engagement with the Council has become difficult, and opportunities to contribute more limited, primarily due to concerns that the third sector co-ordinating body is no longer fully independent of service provision and could be conflicted when representing the range of third sector views.

⁶ See Appendix 1

Part Two: Council's response

- 33 Following the conclusion of our fieldwork we presented our findings to the Council at a workshop in October 2019. At this workshop the Council began to consider its response to our findings and as a result of discussions at the workshop and further reflection on our findings the Council has developed the following actions.

Exhibit 2: the Council's response – actions

Long Term	
The Council celebrates the functional differences seen within each area, but it is not clear if the differences are intended or not or whether the Council can be sure that citizens across the county have equitable access to services.	Core services are consistent across the 5 Community Resource Teams which ensures equal access to services for the citizens of Gwynedd. When redesigning the service and embedding new approaches, dedicated teams trial new ways of working. These are evaluated, and if appropriate, rolled out across the whole of Gwynedd to ensure consistency.
Without meaningful data analysis to understand demand and impact for current and future need, the Council is using pen pictures and case studies to capture individuals' stories. Using data better would improve the Council's ability to shape the service and to determine if it is being successful or not.	Gwynedd and Anglesey Councils and Betsi Cadwaladr Health Board have agreed measures to measure the success of the Community Resource Teams against their purpose of "Helping me live the life I want to live". There will be a specific programme of work for embedding the measures within practice and analysing the information in order to continually adapt and improve services for the benefit of Gwynedd residents.
A pause and review taking into account the effectiveness, economy and efficiency of current solutions within each of the area teams, assessing what works well and what not so well, would help the Council identify the next steps for each location.	Changes within the Service are continually reviewed and evaluated in one to one discussions and at operational and strategic level. Workshops were held in January 2019 and September 2019 to review the Information, Advice and Assistance Service. The workshop findings contribute to the priorities of the Advice and Assistance Information service's work programme. Staff workshops were held for each Community Resource Team in October 2019 to establish a baseline and agree priorities for the next eighteen months. Gwynedd Council has restructured Adult Service to support the 5 Community Resource Team model. The staffing structure for providing a service to the citizens of Gwynedd is sustainable. The Welsh Government's Transformation Fund has enabled the

	<p>formation of a Transformation Team which is a temporary additional resource that will build on the good work that has already taken place, and support the leaders across health and social care to identify and remove barriers, redesign systems, develop skills and appropriate measures, focusing on what matters to the individual. The support is not intended to be in place in the long term.</p> <p>In addition to the temporary resource to support the transformation work, the 'Community Connector' is a role that is being piloted in promoting community activity in order to try and respond to the gaps identified at a local level. Although there is work to be done over the next year to continue to assess the value of this preventative investment, the benefits that have been proven to date suggest that the role has value in the longer term and there will be a need soon to consider the financial implications involved.</p>
<p>The Council needs to develop a sustainable resource model for the Area Teams (people, place, money) for the medium to long term, reducing uncertainty.</p>	<p>The success and sustainability of the five area Teams will depend on the willingness of our partners to work together and integrate.</p>
<p>Prevention</p>	
<p>Whilst the preventative agenda is an inherent part of the operation of the five area teams, the Council and its partners:</p> <ul style="list-style-type: none"> • could do much more to encourage people to present earlier and actually reap the rewards of preventative/earlier intervention. • could further explore the potential of data analytics to engage in actively progress the preventative agenda. For example demand/volume, types of services required and a deeper understanding of the root causes of problems the service is trying to address. 	<p>The Information, Advice and Assistance Service's work programme addresses the need to make information more readily available to the citizens of Gwynedd. Community Connectors in conjunction with the Community Resource Teams will be piloting different and creative approaches to ensure that Gwynedd residents have easy access to information that is helpful to them.</p> <p>Over the next year, arrangements will be put in place to gather and collate information about the gaps that exist in our communities. This will be done through a range of ways such as analysing our Team cases through the performance measure in place (Why haven't we achieved what matters to the individual), IAA data, partner information and conversations conducted with colleagues, community groups and residents. This information will feed into our ongoing assessment of the needs of our communities to identify and agree local priorities that would respond to the gaps that prevent individuals from achieving what matters to them.</p> <p>We will continue to trial and commission creative schemes that offer tangible preventative benefits, but at the same time constantly assess the value of the investments given the evidenced outcomes.</p>

Integration	
<p>The Council officers we spoke to verbalise an awareness of the impact of their activity on the other Council well-being objectives and the national well-being goals, but this is not formally acknowledged or recorded;</p>	
<p>The Council is aware of the impact of their activity on the well-being objectives of BCUHB, but could do more to engage with and integrate with other stakeholders and potential partners; and</p>	<p>There has been considerable investment by the Council to collaborate and to integrate community services with Betsi Cadwaladr Health Board. There is evidence that the Adult Health and Well-being Department is working closely with housing associations in Gwynedd to develop community hubs and additional Care Housing. A specific work programme is in place to improve joint working between the Council and the Police. There is a third sector presence within every Community Resource Team in Gwynedd and the Council is keen to strengthen the relationship with the third sector in order to develop local solutions and preventative services.</p>
<p>Actively seeking out and developing a full range of internal and external partners and helping support the move to a truly joined-up service delivery would bring benefit.</p>	<p>There is recognition that strategic leadership needs to be strengthened to support the removal of barriers to integrated working. In response to this challenge, an Integrated Services Board has been formed for Gwynedd Council, Anglesey Council and Betsi Cadwaladr Health Board along with an Integrated Adult Delivery Group. A Senior Transformation Manager has been appointed, along with a Transformation Team to work across Gwynedd and Anglesey councils and Betsi Cadwaladr Health Board to provide clear strategic leadership and support to the Community Resource Teams to identify and remove barriers to integrated working. A Transformation Lead will support each Community Resource Team individually and will also lead on specific issues on behalf of each Community Resource Team established across Gwynedd and Anglesey. Along with this they will support specific issues that are barriers across Gwynedd such as:</p> <ul style="list-style-type: none"> • Pilot the use of WCCIS as a means of ensuring one common method of recording information within a single Community Resource Team over the next year. • Occupational Therapy – a specific work stream looking at how duplication can be reduced and capacity increased through more effective joint working between employed Occupational Therapists for the Local Authority and the Health Board.

Collaboration	
<p>Third sector bodies expressed an appetite for greater engagement with the Council, and were eager to develop more opportunities to contribute to the well-being agenda;</p>	<p>The Third Sector contributes to the Well-being agenda at a strategic, operational and local level in Gwynedd. Along with the Liaison Group in place, the Third Sector has a presence on the Integrated Services Board for West Wales; Gwynedd, Anglesey Integrated Adult Delivery Group and the Health Board; and presence within each of the community resource teams. The Council is constantly open to adapting the arrangements in place to try and ensure that we have the most appropriate arrangements to promote joint working for the benefit of our residents.</p>
<p>Whilst hubs are not intended to be a physical location for individuals to present, a consequence of having the hubs may be that people present at those locations, therefore the Council needs to consider how it will manage this situation as there appears to be no formalised presence at some of the hubs.</p>	<p>Gwynedd is on the journey of transforming and integrating services. There is an agreement to gradually establish the Community Resource Teams and the Information, Advice and Assistance Service. Currently, Gwynedd citizens can contact the service by telephone or in person at the 5 front doors of the Community Resource Teams. The Information, Advice and Assistance Service's work programme addresses the need to take the service out into the communities.</p> <p>There is recognition that the teams are in a different place on the journey. When redesigning the service and embedding new approaches, dedicated teams trial new ways of working. These will be evaluated, and if appropriate rolled out across the whole of Gwynedd to ensure consistency.</p>
<p>Staff recognise the additional value of proactive collaboration with groups such as general practitioners and the third sector, but the Council needs to do more to ensure that such benefits are delivered in all communities.</p>	<p>The vision clearly sets out the intention to collaborate with GPs and the third sector. The Transformation Team's work programme will support the engagement of key partners in each area over the next 18 months.</p>
Involvement	
<p>Community connectors map opportunities for individuals to undertake activity and support within the community. Whilst there are plans to publish the information in booklets, the Council needs to maximise the use of other outlets such as social media and web based content.</p>	<p>An Information Task Group has been established to ensure consistency in the way that information on well-being services is made available to as wide an audience as possible, both front-line staff and residents. The work programme addresses the use of social websites and the review of the Department's website.</p>

<p>Some of the representatives from the third sector suggested that engagement with the Council has become difficult, and opportunities to contribute more limited, primarily due to concerns that the third sector co-ordinating body is no longer fully independent of service provision and could be conflicted when representing the range of third sector views.</p>	<p>The Council will take account of comments made by 3rd Sector representatives.</p> <p>It is also noted that there is a Third Sector Liaison Group which is a strategic vehicle for dialogue between the Council and the Third Sector. The main role of the Group is to ensure effective information sharing among members and to ensure ongoing collaboration. This is another tool that can be used to influence along with the forums in existing individual areas.</p> <p>Arrangements are in place to ensure that each individual is offered a written copy of their Care and Support Plan.</p> <p>There is a specific work programme in place for the needs of carers.</p> <p>A work programme is in place to establish quality assurance arrangements that will address the need to gather the views of individuals and their carers in relation to the support and services they have received from the Council.</p> <p>We have identified scope for improving the quality of our Equality Impact Assessments and will look to strengthen our arrangements within the new Strategic Equality Plan for 2020-24. It is envisaged that this work will be one of the objectives of the new Scheme which will include specific training for Elected Members and staff with a view to equipping them with the ability to undertake full and timely Equality Impact Assessments (as well as challenging their content) as part of the decision making process.</p> <p>The measures of the Community Resource Teams are based on obtaining the views of the citizens of Gwynedd as to whether the interventions have enabled them to meet what is important to them. This information is core to identifying successes; needs which cannot be met and areas for development. Work will continue over the next year to embed and analyse the indicators to ensure we are delivering against our purpose.</p>
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Corporate

<p>The Council places great emphasis on applying its 'citizen-focused' approach 'Ffordd Gwynedd'.</p> <p>In managing the messages relating to its way of working the Council has limited exposure of officers to the Well-being of Future Generations (Wales) Act 2015. As a result many officers could not demonstrate active consideration of the</p>	<p>As noted, we as a Council place a great deal of emphasis and invest heavily in implementing the principles of Ffordd Gwynedd in order to put the people of Gwynedd at the heart of everything we do. Although much work has been done to equip managers with the knowledge and skills needed to deliver for the people of Gwynedd and evidence shows that this is already happening in a number of services, there is further work to be done in order to embed the mind-set and realize that ambition. In achieving the ambition fully, we believe that the principles are aligned with the 5 ways of working identified in the Well-being of Future Generations Act (2015).</p> <p>It is also noted that work by the Internal Audit Service is ongoing to establish the extent to which the 5 ways of working have been incorporated into the work of the Council.</p> <p>Given the comments of this audit and the findings of the Internal Audit Service's work referred to above, we will consider whether there are any opportunities to confirm or strengthen the link that</p>
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<p>sustainable development principle or the five ways of working.</p> <p>The Council could better demonstrate that 'Ffordd Gwynedd' fully incorporates the five ways of working by using key phrases within its overarching vision. This would show more clearly how these aspects are included as part of the Council's decision-making process.</p>	<p>exists between Ffordd Gwynedd principles and the 5 ways of working.</p>
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34 We will continue to monitor the Council's progress in implementing these actions, and the extent to which they address the issues we have identified in our findings.

Appendix 1

Positive Indicators of the Five Ways of Working

Exhibit 3: positive indicators of the five ways of working

The table below sets out 'positive indicators' for each of the five ways of working that we have identified. We have not used the indicators as a checklist. They should be viewed as indicators. They helped us to form conclusions about the extent to which a body is acting in accordance with the sustainable development principle in taking steps to meet its Well-being Objectives.

What would show a body is fully applying the long-term way of working?
<ul style="list-style-type: none">• There is a clear understanding of what 'long term' means in the context of the Act.• They have designed the step to deliver the well-being objective/s and contribute to their long-term vision.• They have designed the step to deliver short or medium-term benefits, which are balanced with the impact over the long term (within the project context).• They have designed the step based on a sophisticated understanding of current and future need and pressures, including analysis of future trends.• Consequently, there is a comprehensive understanding of current and future risks and opportunities.• Resources have been allocated to ensure long-term as well as short-term benefits are delivered.• There is a focus on delivering outcomes, with milestones/progression steps identified where outcomes will be delivered over the long term.• They are open to new ways of doing things which could help deliver benefits over the longer term.• They value intelligence and pursue evidence-based approaches.
What would show a body is fully applying the preventative way of working?
<ul style="list-style-type: none">• The body seeks to understand the root causes of problems so that negative cycles and intergenerational challenges can be tackled.• The body sees challenges from a system-wide perspective, recognising and valuing the long-term benefits that they can deliver for people and places.• The body allocates resources to preventative action that is likely to contribute to better outcomes and use of resources over the longer term, even where this may limit the ability to meet some short-term needs.• There are decision-making and accountability arrangements that recognise the value of preventative action and accept short-term reductions in performance and resources in the pursuit of anticipated improvements in outcomes and use of resources.

What would show a body is taking an 'integrated' approach?

- Individuals at all levels understand their contribution to the delivery of the vision and well-being objectives.
- Individuals at all levels understand what different parts of the organisation do and proactively seek opportunities to work across organisational boundaries. This is replicated in their work with other public bodies.
- Individuals at all levels recognise the cross-organisation dependencies of achieving the ambition and objectives.
- There is an open culture where information is shared.
- There is a well-developed understanding of how the well-being objectives and steps to meet them impact on other public sector bodies.
- Individuals proactively work across organisational boundaries to maximise their contribution across the well-being goals and minimise negative impacts.
- Governance, structures and processes support this, as do behaviours.

What would show a body is collaborating effectively?

- The body is focused on place, community and outcomes rather than organisational boundaries.
- The body has a good understanding of partners' objectives and their responsibilities, which helps to drive collaborative activity.
- The body has positive and mature relationships with stakeholders, where information is shared in an open and transparent way.
- The body recognises and values the contributions that all partners can make.
- The body seeks to establish shared processes and ways of working, where appropriate.

What would show a body is involving people effectively?

- Having an understanding of who needs to be involved and why.
- Reflecting on how well the needs and challenges facing those people are currently understood.
- Working co-productively, working with stakeholders to design and deliver.
- Seeing the views of stakeholders as a vital sources of information that will help deliver better outcomes.
- Ensuring that the full diversity of stakeholders is represented and they are able to take part.
- Having mature and trusting relationships with its stakeholders where there is ongoing dialogue, and information is shared in an open and transparent way.
- Ensure stakeholders understand the impact of their contribution.
- Seek feedback from key stakeholders which is used to help learn and improve.

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