

External Regulation 2019/20

Audit Wales

Date	Title	Recommendations / observations	Response status RAG and note
Dec 2019	Household Recycling Centres	<p>Report Link: Audit Wales - Household Recycling Centres</p> <p><u>Proposal for improvement</u></p> <ul style="list-style-type: none"> The Council should consider how to increase public understanding of recycling and how they can recycle more effectively at HRCs in order to reduce the amount of general non-recyclable waste. 	<p>(GREEN)</p> <p>Response Link: Household Recycling Centres</p> <p>It is therefore proposed to improve recycling awareness and improve the HRC provision through a number of changes which originate from the WAO report:</p> <ol style="list-style-type: none"> 1. Improved recycling information the HRC's 2. Improved recycling information on the Council website 3. The use of social media to promote recycling initiatives/ideas 4. Target areas of low recycling participation to inform of options 5. Improved engagement during service changes 6. Undertake annual customer surveys to gauge user feedback 7. Provide further training to HRC staff 8. Future opening times will be consistent throughout the year 9. Work with local charities to 'adopt' a HRC to promote recycling and wider local engagement <p>The survey also highlighted the concerns of residents in respect of the opening hours of the sites, particularly the fact that the hours change during the winter months. Residents requested regular opening hours throughout</p>

Date	Title	Recommendations / observations	Response status RAG and note
			the year and it is therefore proposed that the opening hours remain the same throughout the year.
March 2020	Financial Sustainability Assessment	<p>Report Link: https://www.audit.wales/sites/default/files/pdf_9_12.pdf</p> <p>None.</p>	<p>Response Link:</p> <p>N/A</p>
March 2020	Well-being of Future Generations Examination 2019-20: Protect and Enhance the Natural Environment	<p>Report Link: https://www.audit.wales/sites/default/files/pdf_10_12.pdf</p> <p><u>Opportunities for development</u></p> <p><u>Long term:</u></p> <p>R1 - the Council could demonstrate more comprehensively the long-term benefits the various projects are delivering and the way in which they integrate;</p> <p>R2 - the Local Development Plan aims to deliver this principle, but it is not clear if the public and all partners have accepted the need for greater long-term behavioural change; and</p> <p>R3 - the private sector (for example, landowners and private developers) needs to be encouraged to adopt positive behaviour to support Flintshire's long-term vision for the environment.</p>	<p>(AMBER)</p> <p>Long Term:</p> <p>R1 - Agreed that we need to track benefits as part of these projects and report on their delivery, or otherwise.</p> <p>R2 - Not agreed, It is not the role of Local development plan process to evidence behaviour change. Once adopted, the Annual Monitoring Report of the LDP will evidence compliance with policies.</p> <p>R3 - Agreed. This will be part of the on-going engagement work on our Carbon Reduction / climate Change strategy.</p>
		<p><u>Prevent:</u></p> <p>R1 - given the acknowledged cross-cutting benefits of prevention, the Council could consider the cost benefits of the opportunities for further investment.</p>	<p>(AMBER)</p> <p>Prevent:</p> <p>R1 - Agreed. Work is on-going to develop a programme of renewable project investment opportunities, a cost / benefit analysis will form part of that.</p>
		<p><u>Integration:</u></p>	<p>(GREEN)</p> <p>Integration:</p> <p>R1 - Agreed. This work is being taken forward through the Joint PSB work.</p>

Date	Title	Recommendations / observations	Response status RAG and note
		<p>R1 - the Council and its PSB partners could consider further modelling the impact of prevention in terms of health benefits for the public and how the wellbeing objectives may impact on the objectives of partners.</p> <p>Collaboration: R1 - although there are some good examples of cross border co-ordination by the Council, such as prevention of coastal flooding work on the Dee estuary, the Council could consider whether collaboration with neighbouring councils in England could be further strengthened building on the Mersey Dee Alliance work.</p> <p>Involvement: R1 - the Council is taking steps to engage with hard to reach groups and communities and other vulnerable people but further work is needed to involve these groups and those people with protected characteristics; and</p> <p>R2 - greater use of data analytics has the potential to help the Council to target their engagement more effectively.</p>	<p>(GREEN) Collaboration: R1 - Disagree. Collaboration is key to many of the climate change projects which we work on and there is clear evidence of it through work with the NWEAB, MDA, Flintshire PSB and Joint PSB.</p> <p>(GREEN) Involvement: R1 - Agree. This is a key strand identified in our Climate Change Strategy (see above). R2 - Agree. That will be evidenced as part of the Climate Change Strategy.</p>
May 2020	Digital Flintshire Review –	<p>Report Link: Digital Flintshire</p> <p>Proposals for improvement P1 - The Council should take the opportunity to refresh its Digital Strategy to ensure that it:</p> <ul style="list-style-type: none"> • reflects the current national legislative context and emerging best practice including: <ul style="list-style-type: none"> ○ the principles of the Well-being of Future Generations Act; ○ the principles of the Local Government digital declaration; and ○ the Scottish Government’s Digital First Digital standards or the Welsh Government’s Digital Standards, when these are published. <p>P2 - The Council should take the opportunity to update the Digital Strategy to ensure that:</p>	<p>(GREEN) P1 - The Digital Strategy will be refreshed once the Council has renewed its level of aspiration in light of the rapid evolution of digital services during the lockdown period. As part of that exercise the principles referenced will be included</p> <p>P2 - The suggested updates will be made to the Digital Strategy when it is refreshed so that the document is fully up to date.</p> <p>P3 - The Digital Strategy contains a mix of longer term ambitions which are broadly</p>

Date	Title	Recommendations / observations	Response status RAG and note
		<ul style="list-style-type: none"> • its mapping of the digital actions to the Corporate Themes has not identified any unexpected gaps; • it includes a high level timeframe for the completion of the actions; • it removes actions that have now been completed or are no longer relevant; • it fully reflects the collaborative digital activity that is currently being undertaken with Health and the North Wales Economic Ambition Board; • it fully reflects the Council's approach to actions that will promote the embedding of a digital culture with both staff and citizens; • it updates the wording of the actions to reflect the current context and remove any repetition; and • it reflects any relevant lessons learnt from the Coronavirus crisis <p>P3 - The Council should ensure that the new actions identified during the workshop, such as those around embedding a digital culture and behaviours are integrated into its current digital resource planning and Medium-Term Financial Strategy.</p>	<p>outlined and specific projects that incrementally deliver those ambitions. Resourcing requirements are identified for the specific projects as part of preparing the business plan for their inclusion into the Strategy action plan.</p>
July 2020	Rough Sleeping in Wales – Everyone's Problem; No One's Responsibility	<p>Report Link: Rough Sleeping in Wales</p> <p>Recommendations</p> <p>R1 – Intelligent use of data</p> <p>Public bodies and third sector partners should ensure they use data to plan the right future services, and to put in place effective data sharing protocols to ensure they respond effectively and safely to people sleeping rough.</p> <p>We recommend that councils and their partners:</p> <ol style="list-style-type: none"> a) invest in data analytical skills to better understand the current situation and predict future demand to prevent future homelessness; b) review and update data sharing protocols to ensure they support services to deliver their data sharing responsibilities effectively; and c) introduce a single data capture and risk assessment process for to help support safe decisions making in dealing with people sleeping rough. 	<p>(AMBER)</p> <p>R1 - Homelessness is a high cost issue as highlighted in the WAO report. In addition Council Funding there is significant grant available through Housing Support Grant which is to be used to address housing support issues and prevent homelessness.</p> <p>Additional funding has been made available this year 2020/2021 to help with the current homelessness crisis and an additional award of £1.87m has been given to Flintshire to bolster existing Housing Support Grant. This provides a total HSG pot of approx. £7.83m.</p> <p>Engagement with partners and service users has been a key part of the development process for our Delivery Plan for 2021/2022 onwards and this delivery plan is being</p>

Date	Title	Recommendations / observations	Response status RAG and note
			<p>submitted to WGov on the 26th February. The Councils HSG Planning Group approved the Delivery Plan and proposed spend on the 17th February 2021.</p> <ul style="list-style-type: none"> a) Flintshire has developed its Housing Support Grant Delivery Plan using historic demand data. We also propose to engage a partner to deliver some additional data analysis activity with a view to projecting future demand for services. This is to be funded through HSG and is an important piece of work as we move away from the emergency response for covid and into recovery phase. b) A number of data sharing protocols are in place and a full review will be undertaken with local and regional partners in 2021/2022. c) Rough sleeping numbers are down significantly (ZERO 0 @ 19/02/21) following the “all in” approach which is part of the covid emergency health and housing response. Flintshire is seeking to develop a Complex Case Panel in a similar vein to the Social Services’ Early Help Hub Model” for managing not just rough sleeper cases but complex needs and acute homelessness and housing support cases. This will be developed in 2021/2022.

Date	Title	Recommendations / observations	Response status RAG and note
		<p>R2 - Integrated services to tackle complex needs Because public bodies are responding to people in crisis, they often deal with acute issues in isolation and rarely address the fundamental cause of the crisis. To do this requires public bodies to design and create service delivery models that are responsive.</p> <p>a) We recommend that public bodies use our complex needs self-reflection tool to improve how they can jointly address complex needs in the future (the tool is set out at Appendix 2).</p>	<p>(AMBER) Flintshire is committed to working with our partners to tackle all forms of homelessness and complex housing needs; this includes rough sleeping.</p> <p>Through our Housing Support and Homelessness Forum we engage with a wide range of partners to raise profile of homelessness and ensure consistency of response and understanding of this complex social challenge.</p> <p>Regional partnership working is a significant strength within North Wales and Flintshire is a main partner in the North Wales Homelessness Strategy "People, Homes and Services"</p> <p>We shall be working with a wide range of Regional Partners to undertake the self-assessment process, as we acknowledge that a lot of our important partners such as Housing Associations, Health Board, Police, and Ambulance Service etc. all work on a larger footprint that just Flintshire.</p> <p>The self assessment process will commence in Q4 of 2021-2022 across Flintshire and North Wales and outcomes will feed into future collaborative work at both the local and regional level.</p> <p>In addition to this Flintshire is proposing to complete a piece of work to analyse and establish the cost of homelessness by</p>

Date	Title	Recommendations / observations	Response status RAG and note
			<p>reviewing a small number of complex cases that have been open to Flintshire to build up an overall cost for the Council. We then hope to build on this to engage partners to understand overall cost to the public purse.</p> <p>The WAO Report highlights some of the potential costs of homelessness and we are eager to drill down into this for Flintshire to offer a more detailed picture for ourselves and partners.</p>
July 2020	'Raising Our Game' Tackling Fraud in Wales	<p>Report Link: Tackling Fraud</p> <p><u>Proposals for improvement</u></p> <p>R2 – Leadership and Culture All public bodies should champion the importance of a good anti-fraud culture and actively promote its importance to give confidence to staff and members of the public that fraud is not tolerated.</p> <p>R3 – Risk Management and Framework All public bodies should undertake comprehensive fraud risk assessments, using appropriately skilled staff and considering national intelligence as well as organisation-specific intelligence.</p> <p>R4 – Risk Management and Framework Fraud risk assessments should be used as a live resource and integrated within the general risk management framework to ensure that these risks are appropriately managed and escalated as necessary.</p>	<p>(AMBER) R2 - Once the fraud reporting system is live on the Council's website the Whistleblowing policy, Anti-Fraud and Corruption Strategy and Fraud Response Plan will be shared ideally through change exchange.</p> <p>Members will also be trained on their roles and responsibilities under the Whistleblowing Policy and the members Code of Conduct.</p> <p>(GREEN) R3 - Fraud is considered as part of the annual audit planning process.</p> <p>Further detailed fraud risk assessments to be undertaken by Internal Audit.</p> <p>(GREEN) R4 - As above will be used as part of the audit planning process to target resources to address area of high risk of fraud.</p>

Date	Title	Recommendations / observations	Response status RAG and note
		<p>R5 - Policies and Training All public bodies need to have a comprehensive and up-to-date set of policies and procedures which together represent a cohesive strategy for identifying, managing and responding to fraud risks.</p>	<p>(GREEN) R5 - In place.</p>
		<p>R6 - Policies and Training Staff working across the Welsh public sector should receive fraud awareness training as appropriate to their role in order to increase organisational effectiveness in preventing, detecting and responding to fraud.</p>	<p>(GREEN) R6 - In place. Internal Audit staff have and continue to attend Counter Fraud Accredited Courses in addition to their professional qualifications. A further Auditor is due to commence CIPFA's Accredited Counter Fraud Specialist Course.</p>
		<p>R7 - Policies and Training Cases where fraud is identified and successfully addressed should be publicised to re-enforce a robust message from the top that fraud will not be tolerated.</p>	<p>(GREEN) R7 - So far there has been minimal areas of fraud. However the latest could be used as an example. This fraud related to the change of supplier payment details.</p>
		<p>R8 - Capacity and Expertise All public bodies need to build sufficient capacity to ensure that counter-fraud work is resourced effectively, so that investigations are undertaken professionally and in a manner that results in successful sanctions against the perpetrators and the recovery of losses.</p>	<p>(AMBER) R8 - Counter fraud and investigative work are two separate aspects. At Flintshire our response to investigating potential fraud is prompt and successful. There is always scope to expand the level of counter fraud we undertake in addition to NFI. Originally planned for 20/21 counter fraud work on Housing Tenants was to be undertaken. This will resume in 21/22.</p>
		<p>R9 - Capacity and Expertise</p>	<p>(GREEN)</p>

Date	Title	Recommendations / observations	Response status RAG and note
		All public bodies should have access to trained counter-fraud staff that meet recognised professional standards.	R9 - Already in place.
		R10 - Capacity and Expertise All public bodies should consider models adopted elsewhere in the UK relating to the pooling /sharing of resources in order to maximise the availability of appropriately skilled staff.	(AMBER) R10 - This has and will continue to be explored.
		R11 - Tools and Data All public bodies need to develop and maintain dynamic and agile counter-fraud responses which maximise the likelihood of a successful enforcement action and re-enforces the tone from the top that the organisation does not tolerate fraud.	(GREEN) R11 - The Council has a clear Anti-Fraud and Corruption Strategy and Fraud Response Plan. Enforcement of fraud as a criminal offence rests with NWP and is beyond the control of the Council. We would like to see greater recognition of fraud in the public sector by those responsible for the enforcement.
		R12 - Tools and Data All public bodies should explore and embrace opportunities to innovate with data analytics in order to strengthen both the prevention and detection of fraud.	(AMBER) R12 - Within Internal Audit Active Data is already used for data analytics for both the prevention and detection of fraud. There is however always opportunity to enhance the use of this software. To combat council tax fraud, data analytics are already embedded into the Revenues service to ensure single person discounts are only awarded to eligible taxpayers. A comprehensive review of SPD's is undertaken on a bi-annual basis to prevent fraud and assist with detection operations.

Date	Title	Recommendations / observations	Response status RAG and note
			Fiscal software is also used within Creditors to identify any potential duplicate payments.
		<p>R13 - Collaboration Public bodies should work together, under the Digital Economy Act and using developments in data analytics, to share data and information to help find and fight fraud.</p>	<p>(GREEN) R13 - As a public body we already are part of the National Fraud Initiative where data is shared and analysed in an attempt to identify and fight fraud.</p> <p>Data analytics are deployed to ensure that single person discounts are only awarded to eligible taxpayers. A comprehensive review of SPD's is undertaken on a bi-annual basis to prevent fraud and assist with detection operations.</p>
		<p>R14 - Reporting and Scrutiny Public bodies need to collate information about losses and recoveries and share fraud intelligence with each other to establish a more accurate national picture, strengthen controls, and enhance monitoring and support targeted action.</p>	<p>(GREEN) R14 - We completed this as part of the CIPFA fraud benchmarking.</p> <p>The financial recoveries of SPD fraud cases is captured and monitored as part of the bi-annual review.</p>
		<p>R15 - Reporting and Scrutiny Audit committees must become fully engaged with counter-fraud, providing support and direction, monitoring and holding officials to account.</p>	<p>(GREEN) R15 - This is already in place.</p>
Sept 2020	Pooled Fund Arrangements	<p>Report Link: http://democracy.anglesey.gov.uk/documents/s16514/Additional%20Letter.pdf</p> <p>The Auditor General for Wales undertook a review of the arrangements for North Wales regional pooled fund in relation to care home places for older people. The letter outlines a need to review current arrangements of Pooled Fund Arrangements between all six North Wales Councils and Betsi Cadwaladr University Health Board.</p>	<p>(AMBER) P1 - A review of the current pooled budget arrangements for residential care for older people should be undertaken through the North Wales Regional Pooled Budget Group. All seven partners are represented on the group and can work together to seek further</p>

Date	Title	Recommendations / observations	Response status RAG and note
		<p>There was one Recommendation / Proposal for Improvement:</p> <p>P1 - In respect of the pooled budget arrangement we proposed to both councils that they should engage with partners to review the current pooled budget arrangement for residential care for older people, to ensure that transfers of funds between public bodies have a tangible benefit such as better more integrated commissioning of residential and nursing home care.</p>	<p>clarity and guidance from Welsh Government.</p>
Oct 2020	Commercialisation in Local Government: Report of the Auditor General for Wales. October 2020	<p>Report Link: https://audit.wales/sites/default/files/2020-11/Commercialisation-english.pdf</p> <p>R1 - Undertaking commercialisation requires councils to have enough capacity, the right skills and robust but agile systems to be in place. We recommend that councils use our self-evaluation tools to develop a strategy for the extent to which they want to pursue commercialisation.</p> <p>Note: This is not a statutory function but may offer the opportunity to identify ways to support the achievement of corporate strategic objectives.</p>	<p>(AMBER)</p> <p>The Council has already undertaken work to strengthen its commercial approach. This has included a detailed review of income generation opportunities identified across all Portfolios, considering the potential benefits and resources required to deliver them. Continued financial pressures resulting from a prolonged period of austerity, now further exacerbated by the COVID-19 pandemic, means that whilst resources are stretched it is arguably more important than ever for the Council to re-evaluate its commercial strategy, particularly to maximise on any socio-commercial opportunities. That is, utilising a commercial approach to achieve the Council's social strategic objectives. Therefore, it would be beneficial for a self-evaluation to be conducted as a cross organisation activity.</p>


Estyn

Date	Title	Recommendation	Response Link
June 2019	Estyn Report: A Report on Flintshire County Council - June 2019	<p>Report Link: https://www.estyn.gov.wales/system/files/2020-08/Flintshire%2520County%2520Council.pdf</p> <p>R1 - Improve outcomes for learners in key stage 4</p>	<p>(GREEN) R1 - Will be addressed through the detailed individual school support plans that are jointly constructed with GwE, the regional school improvement Service. These support plans are regularly monitored by the Senior Manager for School Improvement who will lead on this aspect of the Post Inspection Action Plan.</p>
		<p>R2 - Reduce exclusions and increase attendance in both primary and secondary schools</p>	<p>(GREEN) R2 - Will be led by the Senior Manager for Inclusion and Progression. The focus will be on enhancing the work of the Inclusion Welfare Service and the Youth Justice Service to provide expert support for schools who have the direct responsibility for managing the attendance and inclusion/exclusion of pupils and so headteachers will be engaged in directly supporting this recommendation.</p> <p>The capacity of the Inclusion Service has been increased with the appointment of a Senior Learning Adviser who will provide stronger strategic management of attendance and exclusions within the portfolio team.</p>
		<p>R3 - Improve the ongoing monitoring and evaluation of the few front line education services identified in the report in order to provide more accurate information about the impact of the local authority's work</p>	<p>(GREEN) R3 - Relates to further refinement of the portfolio's self-evaluation processes to achieve more detailed evaluation of the work of specific teams and their impact/effectiveness. This will be led by the Chief Officer, Education and Youth. The main</p>

			<p>outcome anticipated from this recommendation is more strategic analysis of performance and more focused reports to Scrutiny to keep members well informed and be able to continue to hold the portfolio effectively to account.</p>
		<p>R4 - Manage the reduction in school budget deficits more effectively</p>	<p>(AMBER) R4 - Has been addressed through the development of a specific task group including the Chief Executive, Section 151 Officer, Chief Officer for Education and Youth and the Portfolio Finance Manager. Its focus is on strengthening processes around the management of school deficit budgets and strategically reviewing education funding.</p>

Care Inspectorate Wales (CIW)

Date	Title	Recommendation	Response Link
03.08.2020	Care Inspectorate Wales (CIW) Local Authority Performance Review 2019/20 - Annual Letter	<p>Report Link: https://careinspectorate.wales/sites/default/files/2020-07/200803-Flintshire-en.pdf</p> <p>None.</p>	N/A

Date	Title	Recommendation	Response Link
Feb 2020	Care Inspectorate Wales (CIW) Local Authority Focused activity in Adult Services	<p>Focused activity – Adults:</p>  <p>CIW - Flintshire Adults Services - Foc</p> <p>The focused activity in Adult Services in February 2020, identified the following area for Improvement:</p> <p>A1 - Ensure there is a record of the risk assessments and decisions on local authority’s case records.</p>	<p>(GREEN)</p> <p>A1 - An amendment has been made to the records management process and case file audits have paid particular attention to risk assessment and the recording of associated decisions.</p>

Date	Title	Recommendation	Response Link
Oct 2019	Care Inspectorate Wales (CIW) Local Authority Focused activity in	<p>Focused activity – Children:</p>  <p>CIW -Flintshire letter following Foc</p>	<p>(GREEN)</p> <p>A1 - The new supervision policy has been launched across all services and the effectiveness of the policy and recording of information in the appropriate locations has been monitored and evaluated through case</p>

Date	Title	Recommendation	Response Link
	Children's Services	The focused activity in Children's Services during October 2019, CIW identified the following areas for Improvement: A1 - Managers need to ensure themselves of the effectiveness of the implementation of the new supervision policy.	file audits. This action has been replicated in other service areas to ensure consistency in recording linked to supervision.
		A2 - Whilst the service continues to have ongoing discussions with Adult Mental Health, managers must ensure practitioners communicate on individual cases.	(GREEN) A2 - Professional Supervision between case holders and their managers ensures a focus on discussing the detail of adult mental health cases.
		A3 - Managers need to ensure the evidence of the analysis which informs decision making is recorded at the Early Help Hub multi-disciplinary meeting.	(GREEN) A3 - A revised recording mechanism has been put in place to address this. Case file audits have paid particular attention to this area and recorded evidence of improved analysis recording as part of the decision making process.

Information Commissioner's Office (ICO)

Date	Title	Recommendation	Response Link
07.07.2020	Information Commissioner's Annual Report 2019-20	Report Link: https://ico.org.uk/media/about-the-ico/documents/2618021/annual-report-2019-20-v83-certified.pdf None.	N/A