

Armagh City, Banbridge and Craigavon Borough Council Audit and Assessment Report 2019-20

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



28 November 2019

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We have prepared this report for sole use of Armagh City, Banbridge and Craigavon Borough Council and the Department for Communities. You must not disclose it to any third party, quote or refer to it, without our written consent and we assume no responsibility to any other person.

1. Key Messages

Summary of the audit

Audit outcome	Status
Audit opinion	Unqualified opinion
Audit assessment	The LGA has concluded that the Council is likely to comply with Part 12 of the Local Government Act (Northern Ireland) 2014.
Statutory recommendations	The LGA made no statutory recommendations
Proposals for improvement	The LGA made one new proposal for improvement

This report summaries the work of the Local Government Auditor (LGA) on the 2019-20 performance improvement audit and assessment undertaken on Armagh City, Banbridge and Craigavon Borough Council. We would like to thank the Chief Executive and his staff, particularly the Performance Improvement Manager, for their assistance during this work.

We consider that we comply with the Financial Reporting Council (FRC) ethical standards and that, in our professional judgment, we are independent and our objectivity is not compromised.

Audit Opinion

The LGA has certified the performance arrangements with an unqualified audit opinion, without modification. She certifies an improvement audit and improvement assessment has been conducted. The LGA also states that, as a result, she believes that Armagh City, Banbridge and Craigavon Borough Council (the Council) has discharged its performance improvement and reporting duties, including its assessment of performance for 2018-19 and its 2019-20 improvement plan, and has acted in accordance with the Guidance.

Audit Assessment

The LGA has assessed whether the Council is likely to comply with its performance improvement responsibilities under Part 12 of the Local Government Act (Northern Ireland) 2014 (the Act). This is called the 'improvement assessment'.

In her opinion the Council is likely to discharge its duties in respect of Part 12 of the Act during 2019-20 and has demonstrated a track record of improvement. The LGA did not exercise her discretion to assess and report whether the Council is likely to comply with these arrangements in future years.

Audit Findings

During the audit and assessment, we identified no issues requiring a formal recommendation under the Act. We made one new proposal for improvement (see Section 3). This represents good practice, which should assist the Council in meeting its responsibilities for performance improvement. Detailed observations on thematic areas are provided in Annex C and progress on key proposals for improvement raised in prior years, which had not been fully addressed last year, has been noted in Annex B.

Status of the Audit

The LGA's audit and assessment work on the Council's performance improvement arrangements is now concluded. By March 2020, she will publish an Annual Improvement Report on the Council on the NIAO website, making it publicly available. This will summarise the key outcomes in this report.

The LGA did not undertake any Special Inspections under the Act in the current year.

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

Management of information and personal data

During the course of our audit, we have access to personal data to support our audit testing. We have established processes to hold this data securely within encrypted files and to destroy it where relevant at the conclusion of our audit. We can confirm that we have discharged those responsibilities communicated to you in accordance with the requirements of the General Data Protection Regulations (GDPR) and the Data Protection Act 2018.

2. Audit Scope

Part 12 of the Act provides all councils with a general duty to make arrangements to secure continuous improvement in the exercise of their functions. It sets out:

- a number of council responsibilities under a performance framework; and
- key responsibilities for the LGA.

The Department for Communities (the Department) has published '*Guidance for Local Government Performance Improvement 2016*' (the Guidance) which the Act requires councils and the LGA to follow. Further guidance to clarify the requirements of the general duty to improve was issued by the Department during 2019.

The improvement audit and assessment work is planned and conducted in accordance with the Audit Strategy issued to the Council, the LGA's Code of Audit Practice for Local Government Bodies in Northern Ireland and the Statement of Responsibilities.

The improvement audit

Each year the LGA has to report whether each council has discharged its duties in relation to improvement planning, the publication of improvement information and the extent to which each council has acted in accordance with the Department's Guidance. The procedures conducted in undertaking this work are referred to as an "improvement audit". During the course of this work the LGA may make statutory recommendations under section 95 of the Act.

The improvement assessment

The LGA also has to assess annually whether a council is likely to comply with the requirements of Part 12 of the Act, including consideration of the arrangements to secure continuous improvement in that year. This is called the 'improvement assessment'. She also has the discretion to assess and report whether a council is likely to comply with these arrangements in future years.

The annual improvement report on the Council

The Act requires the LGA to summarise all of her work (in relation to her responsibilities under the Act) at the Council, in an 'annual improvement report'. This will be published on the NIAO website by March 2020, making it publicly available.

Special inspections

The LGA may also, in some circumstances, carry out special inspections which will be reported to the Council and the Department, and which she may publish.

3. Audit Findings

This section outlines key observations in the form of proposals for improvement, arising from following thematic areas of the Council’s audit and assessment:

- General duty to improve;
- Governance arrangements;
- Improvement objectives;
- Consultation;
- Improvement plan;
- Arrangements to improve;
- Collection, use and publication of performance information; and
- Demonstrating a track record of improvement.

These are not formal recommendations, which are more significant matters which require action to be taken by the Council in order to comply with the Act or Guidance. Proposals for improvement include matters which, if accepted, will assist the Council in meeting its performance improvement responsibilities. The LGA may follow up how key proposals have been addressed in subsequent years. We recommend however that the Council’s Performance and Audit Committee continues to track progress on all proposals for improvement.

Our procedures were limited to those considered necessary for the effective performance of the audit and assessment. Therefore, the LGA’s observations should not be regarded as a comprehensive statement of all weaknesses which exist, or all improvements which could be made.

Detailed observations for the thematic areas can be found at Annex C.

Thematic area	Issue	Proposal for improvement
General Duty	<p>The Council has embedded a process for setting objectives and selecting actions in support of the objectives. The next step is to ensure it identifies and prioritises the areas in most need of improvement in order to achieve the greatest benefit for citizens.</p> <p>Selecting actions that are already meeting targets or improving year-on-year (e.g. maintaining above average levels of cleanliness, in Objective 2) may still demonstrate improvement but may not be addressing the highest priorities.</p>	<p>Using its continuous improvement arrangements, the Council should continue developing the process of selecting actions in support of the objectives to ensure, and demonstrate, that the actions selected are those actions in most need of improvement.</p>

4. Annexes



Annex A – Audit and Assessment Certificate

Audit and assessment of Armagh City, Banbridge and Craigavon Borough Council’s performance improvement arrangements

Certificate of Compliance

I certify that I have audited that Armagh City, Banbridge and Craigavon Borough Council’s (the Council) assessment of its performance for 2018-19 and its improvement plan for 2019-20 in accordance with section 93 of the Local Government Act (Northern Ireland) 2014 (the Act) and the Code of Audit Practice for local government bodies.

I also certify that I have performed an improvement assessment for 2019-20 at the Council in accordance with Section 94 of the Act and the Code of Audit Practice.

This is a report to comply with the requirement of section 95(2) of the Act.

Respective responsibilities of the Council and the Local Government Auditor

Under the Act, the Council has a general duty to make arrangements to secure continuous improvement in the exercise of its functions and to set improvement objectives for each financial year. The Council is required to gather information to assess improvements in its services and to issue a report annually on its performance against indicators and standards which it has set itself or which have been set for it by Government departments.

The Act requires the Council to publish a self-assessment before 30 September in the financial year following that to which the information relates, or by any other such date as the Department for Communities (the Department) may specify by order. The Act also requires that the Council has regard to any guidance issued by the Department in publishing its assessment.

As the Council’s auditor, I am required by the Act to determine and report each year on whether:

- The Council has discharged its duties in relation to improvement planning, published the required improvement information and the extent to which the Council has acted in accordance with the Department’s guidance in relation to those duties; and
- The Council is likely to comply with the requirements of Part 12 of the Act.

Scope of the audit and assessment

For the audit I am not required to form a view on the completeness or accuracy of information or whether the improvement plan published by the Council can be achieved. My audits of the Council’s improvement plan and assessment of performance, therefore, comprised a review of the Council’s publications to ascertain whether they included elements prescribed in legislation. I also assessed whether the arrangements for publishing the documents complied with the requirements of the legislation, and that the Council had regard to statutory guidance in preparing and publishing them.

For the improvement assessment I am required to form a view on whether the Council is likely to comply with the requirements of Part 12 of the Act, informed by:

- A forward looking assessment of the Council’s likelihood to comply with its duty to make arrangements to secure continuous improvement; and

- A retrospective assessment of whether the Council has achieved its planned improvements to inform a view as to its track record of improvement.

My assessment of the Council's improvement responsibilities and arrangements, therefore, comprised a review of certain improvement arrangements within the Council, along with information gathered from my improvement audit.

The work I have carried out in order to report and make recommendations in accordance with sections 93 to 95 of the Act cannot solely be relied upon to identify all weaknesses or opportunities for improvement.

Audit opinion

Improvement planning and publication of improvement information

As a result of my audit, I believe the Council has discharged its duties in connection with (1) improvement planning and (2) publication of improvement information in accordance with section 92 of the Act and has acted in accordance with the Department for Communities' guidance sufficiently.

Improvement assessment

As a result of my assessment, I believe the Council has discharged its duties under Part 12 of the Act and has acted in accordance with the Department for Communities' guidance sufficiently.

The 2019-20 year was the fourth in which councils were required to implement the performance improvement framework. The Council's arrangements to secure continuous improvement, should by now be well embedded. Whilst the Council continues to strengthen these arrangements, it nonetheless delivered some measurable improvements to its services in 2018-19 and has demonstrated a track record of ongoing improvement. In my opinion I believe that the Council is likely to comply with Part 12 of the Act during 2019-20.

I have not conducted an assessment to determine whether the Council is likely to comply with the requirements of Part 12 of the Act in subsequent years. I will keep the need for this under review as arrangements become more fully established.

Other matters

I have no recommendations to make under section 95(2) of the Local Government (Northern Ireland) Act 2014.

I am not minded to carry out a special inspection under section 95(2) of the Act.

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28 November 2019

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

Year of Report	Reference	Proposal for improvement	Action taken by council	Status
General Duty to Improve				
2016-17	GD 1	Linking the forthcoming community plan, and the ongoing processes that underpin it, with the Council's future corporate objectives and improvement plan; and within this, ensuring that the process by which functions are prioritised and selected for improvement and improvement objectives developed are transparent and well documented.		Implemented
2016-17	GD 2	Given the statutory nature of the framework, expand upon the current corporate performance management framework to develop a performance improvement policy.		Implemented
2016-17	GD 3	Greater linkage and co-ordination between the departmental business plans, through which performance improvements are delivered, and improvement planning arrangements.		Implemented
2017-18	GD 4	The Council should continue to prioritise the development of its performance management system to enable the performance of all of its functions and services to be measured, to		Implemented

Year of Report	Reference	Proposal for improvement	Action taken by council	Status
		support the identification of those areas that would benefit most from improvement.		
Governance Arrangements				
2016-17	GA 2	As part of the wider corporate planning and performance management system, further explore and determine the role of, and timing of reporting on performance matters to, Council committees (service committees, Governance, Policy and Resources Committee and Performance and Audit Committee).		Implemented
2016-17	GA 3	Facilitate Members of both Committees with training and support to discharge the performance improvement responsibilities.	Training is planned for committee members, particularly those of the Performance and Audit Committee.	In progress
2016-17	GA 4	The Performance and Audit Committee should monitor the activity of the other Council committees charged with the scrutiny of performance improvement.		Implemented
2016-17	GA 6	Consideration of the role of the Council's internal audit in providing assurance on the integrity and operation of the Council's performance improvement processes and progress against performance improvement targets.		Implemented
2017-18	GA 7	The Performance and Audit Committee, as part of its responsibility to consider the adequacy of		Implemented

Year of Report	Reference	Proposal for improvement	Action taken by council	Status
		management response to issues identified by audit activity, should receive regular updates on progress against the 'proposals for improvement'.		
Improvement Objectives				
2016-17	IO 1	Ensuring that each improvement objective is focused on outcomes for citizens, detailing how citizens will be better off where the Council improves as intended.	The 2019-20 Improvement Plan does not contain an explicit section setting out the benefits that citizens can expect.	In progress
2016-17	IO 2	Providing more specific and transparent detail within the improvement plan on what key actions entail and how they are to be delivered.		Implemented
2016-17	IO 3	Expanding improvement targets to provide a wider coverage of improvement objective elements and key actions.		Implemented
Consultation				
2016-17	CONS 3	The questions in the consultation sought agreement on the objectives and provided an opportunity for comment. From our own experience of consultations, we believe that providing additional discussion points and explaining any specific matters the Council wish to obtain comment on, or guide consultees to matters they may wish to reflect upon, encourage more meaningful responses.		Implemented

Year of Report	Reference	Proposal for improvement	Action taken by council	Status
2016-17	CONS 5	Publishing a transparent synopsis of responses together with what impact, if any, these had on improvement objectives would demonstrate to consultees that their views are being considered.		Implemented
2017-18	CONS 7	The Council should try to identify why it did not receive any formal responses to its performance improvement consultation exercises, with a view to tailoring its efforts to promote its performance improvement responsibilities and engage with citizens and stakeholders.	<p>The Council now makes extensive use of the Consultation Hub, internally and externally. Consultation is conducted in line with policy and the Council has revised the look of the plan to try to engage more widely with citizens. It also uses a broad range of media to be as inclusive as possible.</p> <p>The Consultation response rate for PIOs 2019-20 shows an improvement from three responses (2018-19) to nine responses. This is still low but improving and Council should continue to promote its performance improvement responsibility and engage with citizens and stakeholders.</p>	In progress
Improvement Plan				
2017-18	IP 1	In relation to the information available to underpin the general duty to improve and to develop the Performance Improvement Plan, the plan should detail the progress that the Council is making in establishing the information systems	Throughout its Plan, the Council sets out how objectives and actions are identified, why objectives were chosen and gives examples of information recorded on its systems.	In progress

Year of Report	Reference	Proposal for improvement	Action taken by council	Status
		and using data to support the plan and demonstrate improvement in its functions.	<p>The Council's performance software system is in use by all departments and includes management reporting of progress against business plans. It will be developed to include other action plans.</p> <p>The Council's Performance Improvement Officer is progressing increased awareness and further use of the software system.</p> <p>Going forward, Council should include, in the Plan, information on developments and progress made with the new performance software system and other relevant data capture systems to keep citizens informed.</p>	
Performance Reporting and Data Collection				
2017-18	PRDC 1	In addition to any local indicators and standards relating specifically to improvement objectives, the Council should select a range of local indicators and standards to enable it to measure and monitor improvement across its full range of functions, as part of its general duty arrangements to continuously improve. This information should be included in the published self-assessment and provide year on year comparisons.	New guidance on the General Duty to improve was issued by the Department for Communities, requiring the evidencing of these arrangements in the Plan to include examples of self-imposed indicators relating to the General Duty. This guidance was issued in June 2019 and whilst the Council has not included this information in its 2019-20 Improvement Plan, it should consider what examples it will use in future Plans.	In progress

Year of Report	Reference	Proposal for improvement	Action taken by council	Status
2017-18	PRDC 2	The Council should ensure that a new performance management framework is established and embedded across all of its functions without delay.	<p>Senior management has approved a Performance Management Framework.</p> <p>The Framework is scheduled to go before the Governance, Policy and Resources Committee (GPRC) in November 2019, and then to full Council.</p>	In progress
2017-18	PRDC 3	The Council should continue working with other councils and the Department to agree a suite of local indicators and standards. This will enable meaningful comparisons to be made and published in line with its statutory responsibility.	<p>A sub-group of SOLACE's performance improvement working group has produced a paper on the way forward to establish a regional performance framework (benchmark framework). The approach will be agreed with the Department for Communities. A meeting of the working group took place in November 2019 and it was agreed a further meeting was required to further discuss and agree an approach/way forward.</p> <p>This meeting will be co-ordinated by DfC with invites to representatives of the local government performance working group.</p> <p>Some progress on benchmarking has been made in the 2018-19 Performance Assessment report by Council.</p>	In progress

Year of Report	Reference	Proposal for improvement	Action taken by council	Status
			However, significant progress by all councils is essential in the coming year to allow a broader range of functions to be compared.	
2017-18	PRDC 4	Self-assessment reports must include a section on performance in relation to its general duty to improve as required under the legislation.		Implemented
2017-18	PRDC 5	Self-assessments should not focus solely on the underlying initiatives, but also include an assessment of the Council's progress in delivering its improvement objectives.		Implemented

Annex C – Detailed observations

Thematic area	Observations
General duty to improve	<p>The Council has in place arrangements to secure continuous improvement in the exercise of its functions. However, a clear description of how the Council will discharge its duty under s84(1) of the Act has not been set out in the 2019-20 Performance Improvement Plan. New guidance on the General Duty to improve was issued by the Department for Communities, requiring the evidencing of these arrangements in the Plan to include examples of self imposed indicators relating to the General Duty. This guidance was issued in June 2019, and whilst Council was unable to include this information in its 2019-20 Improvement Plan, it should consider what examples it will use in future Plans.</p> <p>The Council has five improvement objectives, which relate to a range of the Council’s services. In addition to the improvement objectives, there are seven statutory performance measures in place for planning, waste and recycling, and economic development. The community planning engagement process identified priority areas on which the Council focuses and these priority areas have informed the identification of the Council’s performance improvement objectives.</p> <p>The Council has put in place arrangements to select objectives and has established a self-analysis process for selecting the actions in support of the objective but the improvement objectives remain relatively fixed in their aspirational community planning origins. In response to previous audit proposals for improvement, the Council has sought to tweak the improvement objectives to bring them closer to the selected actions that are within the remit of the Council.</p> <p>The Council developed a draft Performance Management Framework that outlines how the Council’s strategic objectives, including those set out in the Community Plan and the Corporate Plan, are cascaded throughout the organisation. It sets out the Council’s approach to performance management and improvement, and follows a ‘Plan, do, review’ cycle.</p>

Thematic area	Observations
	<p>The Council has implemented its performance software system, which is in use by all departments and includes management reporting of progress against business plans. It will be developed to include other action plans. The Council's Performance Improvement Officer is progressing increased awareness and further use of the software system.</p>
Governance arrangements	<p>The Council has adequate governance and scrutiny arrangements for performance improvement and these arrangements are operating effectively.</p> <p>The Council's 'Governance, Policy and Resources Committee' (GPRC) is responsible for the approval for performance improvement objectives, plans and reports on statutory indicators. The Committee meets monthly. Progress against proposals is reported to the Performance and Audit Committee on a quarterly basis.</p> <p>The Performance and Audit Committee advises the Council and Chief Financial Officer on, amongst other things "...the performance of Council Departments and Services, specifically in relation to the statutory duty of Council for putting arrangements in place for continuous improvement." The Committee meets quarterly and receives the Performance Improvement Plan, the Self-assessment Report and a six-monthly progress report on the annual improvement plan. Individual service committees receive reports on progress against business plans, including relevant performance improvement objectives. The council's performance management system now produces the progress reports. Training and development on the new system is ongoing.</p> <p>Each Council department prepares an annual business plan. Heads of department are responsible for overseeing implementation of their plan. In this regard, each of the actions underpinning the objectives has a realistic service plan, timetable and budget. The business plans add more detail to the broader strategic planning framework. A range of actions, from within business plans, feed into the annual performance improvement plan under each improvement objective. The plan links to community planning themes and corporate priorities and provides details under a range of headings consistent with the requirements of legislation and guidance.</p> <p>The Executive Management Team approved the council's Performance Policy and the Governance, Policy & Resources Committee and full Council agreed it in June 2019. Council will formally implement it following regional Trade Union consultation in 2020.</p>

Thematic area	Observations
Improvement objectives	<p>The improvement objectives cover a wide range of Council services and are intended to relate to both improving Council functions and improving services for communities and citizens.</p> <p>The plan outlines the work of the cross-departmental group and the workshop, responsible for setting the objectives and selecting the supporting functions/actions, which relate to the Community and Corporate priorities. The Council and committees formally agree the objectives and supporting actions. Under each objective, the plan has identified success criteria and measures to demonstrate achievement of the supporting actions. These actions relate to improving functions and services for communities and citizens but the link between the objective and the actions in terms of overall measurement could be improved. The Council has adjusted the improvement objectives to bring them closer to the selected actions but more work is required to set out the purpose and scope of the objectives. For example, Objective 4 ‘We will implement recommendations from Building Control and Planning Service reviews’ is not clear on the benefit for citizens.</p> <p>The Council has now established arrangements for the collection of information and must focus on ensuring that the information collected will allow it to assess whether it has met the improvement objectives applicable to that year. If the objectives are more long-term, then appropriate milestones should be set to assess/demonstrate progress in that year.</p>
Consultation	<p>The Council has met its statutory duty to consult on the proposed 2019-20 performance improvement objectives. The consultation process was transparent and open and was conducted in line with the Council’s internal draft policy, which is now in place but has not been formalised yet. Evidence of the consultation process was documented and has been retained; the results of the process were used to inform the 2019-20 corporate improvement objectives; and there is evidence of ongoing dialogue between the Council and the community.</p> <p>While the consultation responses on the Performance Improvement Plan have increased since last year, overall, they remain low, with nine responses compared to three the previous year. The Council should continue to encourage engagement in performance improvement across a range of Media.</p>

Thematic area	Observations
Improvement plan	<p>The Council's 2019-20 Corporate Improvement Plan complies with the Act and with DfC guidance in all regards except:</p> <ul style="list-style-type: none"> • the statement outlining the nature of its general duty to improve; • the inclusion of general duty self-imposed indicators and standards; and • the clear identification of visible improvements that citizens can expect to see. <p>In mitigation, the Council has stated that changes were made to the plan in order to better engage with the target audience and language has been 'softened' accordingly. The Council believes that the whole plan and assessment process encapsulates the arrangements to secure continuous improvement in the exercise of its functions and that the 'General Duty' and benefits are implicit within the narrative.</p> <p>However, the Local Government Auditor believes that the Performance Improvement Plan needs to be more specific in its description of the Council's General Duty as required in the guidance. As in previous year's, the council should include a section under each objective along the lines of 'What improvement can residents, businesses or visitors expect?' In doing so, the Council should try to be as clear as possible on the impact and measurement of the objective itself.</p>
Arrangements to improve	<p>The Council's arrangements to secure the achievement of the statutory indicators and to comply with the general duty to improve are adequate.</p> <p>These arrangements are detailed in Departmental Business Plans; Quarterly reports on business plans to Strategic Directors; Mid-Year and Annual Reports to Committees; Departmental Risk registers and updates; and the Performance software system in use by all departments to monitor the progress of business plans.</p> <p>The Council's Corporate Planning Framework provides the arrangements that establish the links between the service/function improvements to be delivered through the Departmental Business Plans and Action Plans (at Service; Programme; and Project level) and the strategic direction / priorities set out in its Community Plan and Corporate Plan.</p>

Thematic area	Observations
Collection, use and publication of performance information	<p>The Council's arrangements to assess its performance and to publish the results are adequate. The published assessment report contains explanations and plans for 2019-20 where improvement objectives and indicators have not been met, and benchmarking information on the Council's performance over the prior three financial years, as well as performance compared to other local Councils.</p> <p>The Council has implemented a new performance software system, which it is using to provide relevant information that supports the plan and to assist in demonstrating continuous improvement. For each indicator, the system is capable of recording baseline and historic performance to identify trends and assist in the identification of areas in need of improvement. It collects data relating to a range of statutory and non-statutory indicators in support of the objectives. In this regard, it is meeting its statutory duty. However, there is less clarity regarding measurement of the objectives themselves.</p> <p>Performance is reported regularly to Senior Management, committees and council in quarterly and six-monthly update reports e.g. on business plan progress.</p> <p>The Council has compared its performance year-on-year and with other councils in relation to the statutory indicators and standards; and in relation to prompt payment and absenteeism.</p> <p>The new DfC guidance, issued in June 2019, requires the assessment report to include an assessment of the effectiveness of the continuous improvement arrangements. The Council has included a section (section 9) on the general duty and continuous improvement in the 2018/19 assessment report but it does not offer an explicit assessment of the effectiveness of council's performance. Elements of the introduction could be considered as an overall assessment and assessment is implicit in the full document. The Council could improve on this for next year.</p> <p>A sub-group of SOLACE's performance improvement working group has produced a paper on the way forward to establish a regional performance framework (benchmark framework). The approach will be agreed with the Department for Communities (DfC). A meeting of the working group discussed the issue in November 2019.</p>

Thematic area	Observations
	<p>Some progress has been made in the current year following advice from the Department for Communities that councils should benchmark at least two self- imposed indicators relating to the general duty to improve in addition to benchmarking the statutory indicators. The Council has benchmarked these indicators against the other Councils within the annual assessment report 2018-19. Significant progress by all councils is essential in the coming year to allow a broader range of functions to be compared.</p>
<p>Demonstrating a track record of improvement</p>	<p>The Council can demonstrate a track record of performance improvement at an operational level. In particular, the Council has a record of performance over the past three years, which indicates achievement of measures of success and outcomes against actions in support of its performance improvement objectives and other indicators. There are performance reporting arrangements in place with progress and achievement being tracked through the performance management system. However, this is not the same as measuring the achievement of the objectives.</p>